

Title: Milford Validation Master Plan Procedure

Document No: 730002232

Version No: 04

Page 1 of 5

1. PURPOSE

The purpose of this procedure is to track, schedule, and prioritize validation activities on the Validation Master Plan for the Milford site, that is needed to establish the adequacy of site manufacturing processes, test methods, and equipment.

This procedure defines and outlines the risk assessment, priorities and resources required for validation activities.

2. SCOPE

The scope of this procedure is the validation activities governed by the 730000837, Waters Global Validation Policy.

Ongoing, planned and completed validation activities will be captured in Milford Process and Equipment Validation Master Plan 730002779 (hereafter referred to as "VMP").

This procedure excludes the following:

- Design Validation of Waters product intended for commercial distribution
- The manufacture of product not intended for commercial distribution

Software Validation and the validation of software tools as defined in 730000617, CSV: Global Software Tool Val Policy

3. DEFINITIONS AND ABBREVIATIONS

Term	Definition / Abbreviation
In Vitro Diagnostics (IVD)	Any medical device which is a reagent, reagent product, calibrator, control material, kit, instrument, apparatus, equipment, or system, whether used alone or in combination, intended by the manufacturer to be used in vitro for the examination of specimens, including blood and tissue donations, derived from the human body, solely or principally for the purpose of providing information
Legacy	Production equipment, test methods, or processes that have already been installed and operating in production. Manufacturing processes, test methods, and equipment (non IVD) currently in service prior to 2016
VMP	A summary of the overall strategy for conducting validation activities at a facility. The Validation Master Plan describes the validation overview, approach, and status of each manufacturing process, test method and/or equipment
Qualification	A series of inspections and tests to ensure that critical requirements necessary for product quality are satisfied, and that documents and produces necessary to properly operate and maintain the system are in place.
Validation	Establishing documented evidence that provides a high degree of assurance that a specific process will consistently produce a product meeting its predetermined specifications and quality attributes.
Equipment	An organization of engineering components that have a defined operational function.
Test Method	A defined analytical process that produces a test result.
Process	An activity or group of activities that takes an input, adds value to it, and provides an output to an internal or external consumer; a planned and repetitive sequence of steps by which a defined product or service is delivered.
Fit for use	Legacy manufacturing processes, test methods, and/or equipment that have been used in production prior to 2016, as they have been proven over time to verify and produce customer acceptable instruments, are considered excluded from the VMP scheduling.
Low impact	Manufacturing processes, test methods, and equipment that are considered to have a minimal effect to the final product, and/or are adequately tested at later production steps to ensure proper function, are considered excluded from the VMP scheduling, and shall be assessed via the VMP Submission Form, 730004131.

Title: Milford Validation Master Plan Procedure

Document No: 730002232

Version No: 04

Page 2 of 5

4. ROLES AND RESPONSIBILITIES

The below structure may involve other resources as and when required.

Roles	Responsibilities
Director, Milford Manufacturing Operations	Annual reviewer of the validation activities against the planned work
Validation Engineering	- Author, Reviewer and VMP coordinator - Creation and Maintenance of VMP - Reporting Validation Key Performance Indicators during annual review - Perform and support validation activities as defined in 730001835
Quality Assurance Engineer	- Approver of VMP - Assuring compliance with appropriate regulatory, business, technical and user community requirements. - Providing support for the creation, independent review and approval of deliverables.
Management	- Reviewer of annual Validation Key Performance Indicators - Assign resources as required to support validation activities as defined in 730001835
System owner or Originator	Completion of VMP Submission Form or Validation Assessment Form

5. REFERENCES / RELATED DOCUMENTS

Doc No:	Document Title
730000837	Waters Global Validation Policy
730001835	Process Validation Procedure for Milford
730000295MP	Quality System Document Control
WAT000050MP	Waters Record Retention Corporate Policy
730000523	Good Documentation Procedure
730001948	Clinical Part Numbers List

6. FORMS / TEMPLATES

Doc No:	Document Title
730004131	VMP Submission Form
730001938	Validation Assessment Form

6.1. Records

Ref No:	Document Title
730002779	Process and Equipment VMP- Milford

7. HEALTH & SAFETY

No Health & Safety specific considerations.

7.1. Equipment/Materials of use Required

Not Applicable

Title: Milford Validation Master Plan Procedure

Document No: 730002232

Version No: 04

Page 3 of 5

8. PROCEDURE

The VMP will be revised based on the following activities that shall identify manufacturing process, test method and/or equipment, responsibility and target completion date.

8.1. New processes, Test Methods, or Equipment:

To add new manufacturing processes, test methods, and equipment shall require the completion of the VMP Submission Form, 730004131, in order to be added to the VMP and have assigned resources, status and estimated date of completion.

8.2. Change to existing Processes, Test Methods, or Equipment:

Changes to manufacturing processes, test methods, and equipment will require completion of the Validation Assessment Form, 730001938.

8.2.1. Risk Assessment

The qualification requirements for changes to an existing manufacturing process, test method, or equipment shall be determined through the completion of the Validation Assessment Form, 730001938, which enables the Executor to perform a risk assessment.

The change shall be risk assessed as Low, Medium or High as follows:

- **Low:** If the change is inadequate or performed improperly it will not cause a safety hazard and/or poor performance of the Process, Test Method, or Equipment.
- **Medium:** If the change is inadequate or performed improperly it has the potential to cause a safety hazard and/or poor performance of the Process, Test Method, or Equipment.
- **High:** If the change is inadequate or performed improperly it has a high probability of causing a safety hazard and/or poor performance of the Process, Test Method, or Equipment.

Examples of changes, the associated risk level, and the requalification or revalidation requirements, are provided in the table below. The following list is not fully encompassing.

Low	Medium	High
- Document changes - Replacement of identical components - Calibration/Preventive Maintenance	- Part number adds - Instrument firmware updates - Duplicate system/process - PC operating system updates - Local physical moves (same site) - Replacement of non-identical components - Minor software improvements	- Significant software/hardware changes - Specification changes - Firmware updates for a station that download s firmware - Physical moves to different sites
Excluded from further qualification activities	- VAF required - No EDV or TMV - IQ, OQ, PQ as appropriate	- VAF required - EDV, TMV, IQ, OQ, PQ as appropriate

8.3. Status

Validation activities shall be listed on the VMP with the appropriate status:

- **“Pending”** status will be assigned to the validation activities with the estimated target completion date. Awaiting resources and/or system availability.
- **“Active”** status will be assigned to the validation activities in progress.

Title: Milford Validation Master Plan Procedure

Document No: 730002232

Version No: 04

Page 4 of 5

- **“Complete”** status will be assigned to the validation activities upon completion of deliverables as defined in 730001835.
- **“Inactive”** status will be assigned to manufacturing processes, test methods, and/or equipment that are no longer used in production.

8.4. Prioritization of VMP items

Validation activities will be assigned “Urgent”, “Normal”, “Fit-for-use” or “Low Impact” priority by the VMP Coordinator based on the risk assessment of changes, functionality of the system, and/or production scheduling.

- **“Urgent”** priority: Validation activities requiring immediate action.
- **“Normal”** priority: Validation activities not requiring immediate action.

Examples of “Urgent” and “Normal” priorities are provided in the table below. The following list is not fully encompassing.

Urgent	Normal
• Production line down • Compliance non-conformance	• Future production expansion • Process improvement activities

8.5. Review Period

The VMP will be reviewed at least annually.

Validation engineering will maintain the VMP between review cycles and update, as required, upon receipt of VMP Submission Form, 730004131 and/or Validation Assessment Form, 730001938, that results in a change that requires the execution or re-execution of a validation activity, as defined by 730001835, Process Validation Procedure for Milford Site.

9. APPENDICES / ATTACHMENTS

Not Applicable

Title: Milford Validation Master Plan Procedure

Document No: 730002232

Version No: 04

Page 5 of 5

DOCUMENT HISTORY

VERSION:	04	ORIGINATOR:	Tetiana Morse	Change ID:	N/A
SUMMARY OF CHANGE: Complete re-write of the Procedure following revision of Waters Global Validation Policy, 73000837.					