

Overview

Project lifecycle stages:

Design – Planning – Execution – Completion Key Considerations for each

Areas for Special Focus

Actionable Information

'War Stories'

Q & A

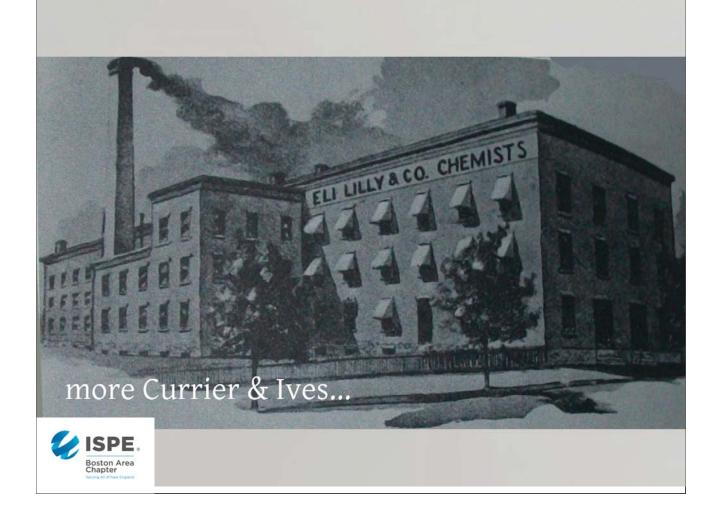


'Retrofit' Project?

Any project executed post-licensure

whether the Plant is....







Retrofit Projects are executed:

- During Plant-wide Shutdowns
- Concurrently with manufacturing

Presentation focus: Concurrent with Operations





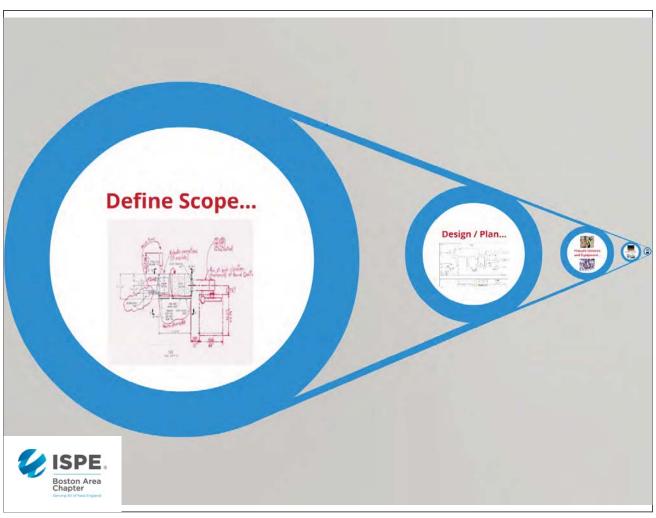


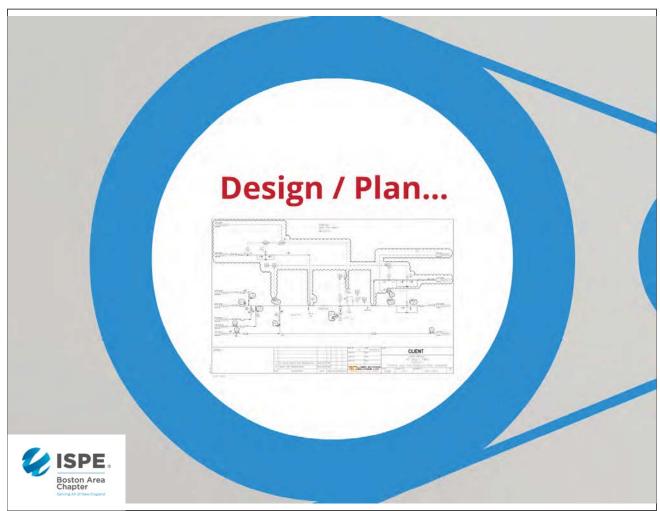
So what?

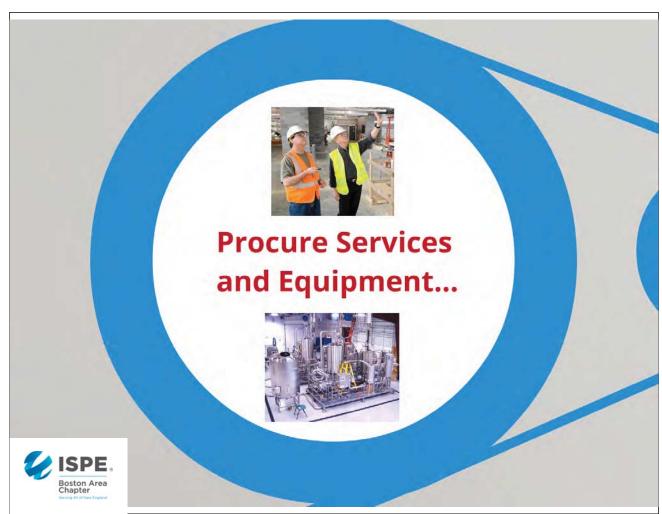
Project Management is a Mature Science















Principal Concerns of Retrofit Projects

Manufacturing:

"When can we return to production?"

Quality:

"How can we **prove** no adverse effect on:

- · Work In Process?
- The processes under modification

Regulatory:

"How can we prove no adverse effect on regulatory filings?"



retrofit projects multiply the opportunity for collision

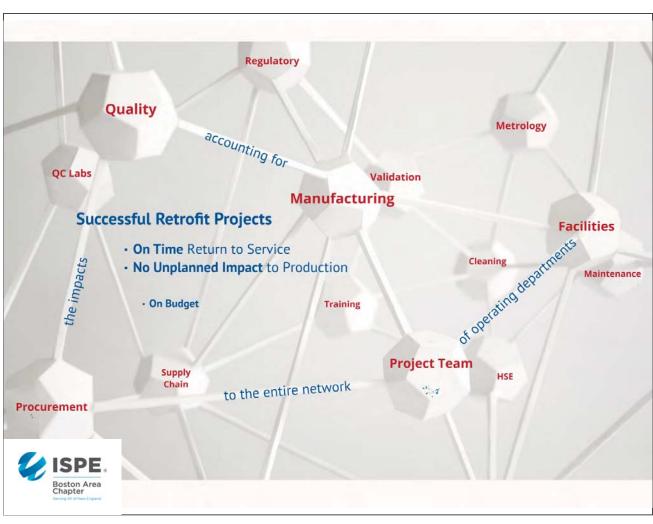


...this is what keeps owners up at night // ISPE

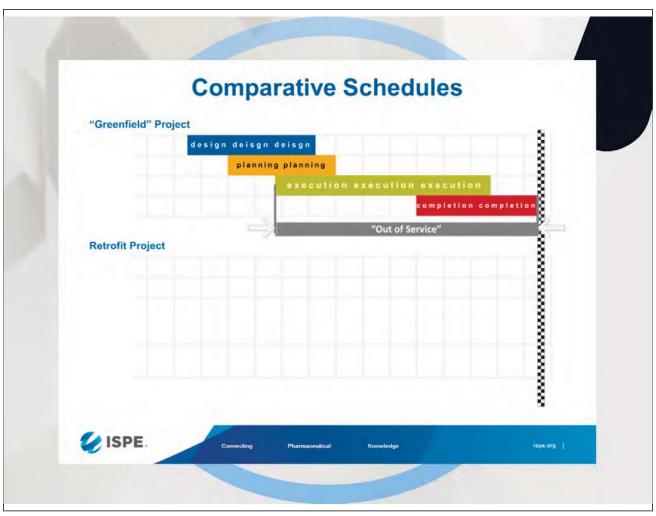


Consider the view from 30,000 feet....













Retrofit Concerns

Design

Execution

- Design Basis Accuracy
- Utility Supplies
- Custom Designs

Planning

Completion



Design Approach

Involve key stakeholders from concept phase

- the usual departments
- · Manufacturing, Supply Chain
- · QA, QC, Validation, Regulatory, HSE
- · Find the schedule constraints
 - KNOW THE DEAL BREAKERS



Identify likely impact areas



- Maintain adequate operational accessibility
- THINK CLEAN





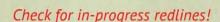


Design Issues

Design basis accuracy

- · Don't assume record set is current
- · Walk it down even the "as-builts"
- · Verify performance data
- Investigation work needed?





Risk from all-contract project teams

- · Owner lacks true sense of data accruacy
- · Limited access to data and 'where bodies buried'
- · No 'tribal knowledge' retained
- Reliance on non-engineering resources (e.g. piping specialists) for detail design: less Cost, more Risk

Inaccurate source data is #1 cause of quality incidents





Design Issues | Sestion Area Chapter | Service of the England of

Custom Designs

Troubleshoot before installation



Utilities: Look beyond Generation and Storage

Could new Operating loads or Test loads 'crash' a system?

Require that vendor FAT conditions match site conditions

Plan supplemental vendor capabilities or consider alternate FAT site

Start familiarization during FAT (mfg, QC, maint, etc.)





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- Mitigating Additional Risk
- · Resource Loading
- Vendor Management
- · Return to service



Risks to Manufacturing Environments

- · How to prove environments unaffected by retrofit work?
 - · build, then clean v. clean while building
- Cleaning roles: Contractor / Mfg / Routine
- · Gowning requirements for project space
 - · mfg. requirements trump construction
- How to traverse active spaces?
- · HVAC impact during retrofit
 - Airflow profiles
 - · Sampling requirements
 - Mark a clearance zone around Low Returns to avoid blockage by construction equipment or materials
 - · Consider proactively change HEPAs



Process Control / Data Risks

Plan sequences for systems shutdown & startup

- Inter-system communication affected by startup order
- · Avoid interlock knots and error message avalanches
- · Identify effects on systems remaining in service

Record/confirm version numbers pre-/post shutdown

Make 'as-left' backups of code and parameters

· Especially systems remaining unmodified

Ensure all PLC/DCS backup batteries are refreshed

· Avoid loss of parameters, restoration of obsolete code

Risk of data loss, manufacturing deviations



Resource Planning 1

Internal departmental support

- · QC: sampling & testing
- Facilities / Metrology / Cleaning Staff
- · Manufacturing: SOP revisions
- · Training: for trades, contingent staff, Mfg
- · QA and Validation: commissioning and qualification

External Contractor/Trades support:

- · Key consideration: Lead Times
 - · Vendor Qualification / Audits
 - · Requests For Quotations
 - PO Approval and other commercial processes
 - · Training: Safety, Quality, Permitting & Reporting



Resource Planning 2

Project Spaces

- · Desks, conference rooms, office trailers
- Owner Network IDs / access for key contractors
- Connectivity 'guest' network or hotspots
- · Parking, lockers, non-disposable gowning
- · Lay-down areas, special warehousing requirements

Supplies

- Gowning materials
- Cleaning supplies and Production Consumables
- · Waste Removal / Recycling





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Pre-plan the Quality Processes

- · for planned activities and contingencies
- · Do not use EQMS (e.g. TrackWise) as a PM tool

Harmonize Safety Management

 Agree Project Safety Plan which works with both the Owner's and Construction Manager's procedures

Incentive / Penalty Clauses

· For performance or key personnel

Most Important:

Informed, empowered Decision Makers



Returning to Service

- Installation Complete! We're-done! Umm, No
- Proactively plan:
 - Preparation of TOPs concurrent with construction
 - · Handoffs, for each system:
 - · Construction -> Commissioning -> Validation -> Manufacturing
 - Handoff procedures/criteria developed by independent Owner resource in cooperation with the CM
 - · Release of utilities to support CQV schedule
 - Ramp up Commissioning while Construction ramps down
 - Keep Trades available through commissioning: things break, flaws discovered, adjustments are required



Connecting

Pharmaceutica

Knowledge

....



Retrofit Concerns

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Planning

- · Mitigating Additional Risk
- · Resource Loading
- · Vendor Management
- · Return to service

Execution

- Communication
- C&Q / Training Overlap
- Decommissioning

Completion



Keep A Manufacturing Focus



Develop a project-specific Communication Tool

 Mfg needs access to (and approval of) the up-to-date, detailed schedule of activities - avoid suprises!



Orient thinking toward impact avoidance

 Absolutely critical to have 24/7 coverage of 'crisis team' empowered decisionmakers from Mfg., Quality and Regulatory

Develop a consensus method for communicating changes to the project plan - BOTH WAYS







Some Not-So-Obvious Concerns

- Startup & C/Q/V
 - Use to train Mfg / Facilities / QC on new equipment
 - Consider training dependencies
 - Contract Lab Services? Utility Capacity?
- Decommissioning
 - · Open Investigations, CAPAs, Change Controls?
- Vibration / Noise
 - Construction (trenching, etc.) / equipment movement
- Utility Isolation
 - Hot Taps, Hot Work, Label Outlets for Contractor Use



...things just don't go accoring to plan





Murphy's Law

What if...

 Manufacturing doesn't finish on time



- Equipment is not available or found in an unexpected condition
 - State or local inspection issues



Surprises in the walls





Murphy's not done...

- Non-routine use of systems cause upsets
 - · excessive flow, increased velocities, spikes
 - · biofilms flaking from drying out



- Opportunities for visual inpection may have unintended consequences
 - · what if you find rouge?



- · Idle systems can freeze during Winter Shutdowns
- Project Activities create damage
- · Repairs interfere with Manufacturing operations









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Completion

- Mitigating Additional Risk Qualification
 - Doc Revision
 - Training (non-Mfg)
 - Regulatory Filings



Defining 'Done'	As	At Or I
Completion Requirements	SOP Revisions	8
	Work Orders	8
	Training / OJTs	
SOPs: don't forget PM, QC, Cleaning, etc.	Regulatory Filings	8
	Action Notices	8
 Resources for timely closeouts Approach: Guilty Until Proven Innocent 	Change Controls	8
	Validation Reports	8
	As-Built Drawings	8
	TOPs	8
Retrofit Project	Mechanical Work	8
		8
reenfield Project Mechanical Work TOPs As-Built Drawing	s Validation Reports	

Returning to Service



Quality Requirements (waters, CS, EM, HEPA...)

- Sampling / testing / release
- Consider dependencies (can WFI sampling begin if RO/DI is provisionally or fully released?)
- Contingency Plans for failed samples

Plan the Activation of New Documentation

- · SOPs Manufacturing, Cleaning, EM, Maintenance...
- Training new curricula, OJTs, other prerequisites ex: QC training for sampling on new equipment
- Consider dependencies to be ready to operate (can we train on approved drafts?)

Key Takeaways:



Key Takeaway 1

Informed and Accessible Decision Makers

 An informed team can make good decisions fast



Resourcing

'An ounce of prevention...'

- · Planning and Investigation
- CQV Support: Mfg + Eng + Validation
 - · Document Revision / Training
 - · Monitoring / Sampling
 - · PM / Metrology
 - Cleaning



Key Takeaway 3

Detailed Plan for Return to Service

- Agree Dependencies in Advance
- Agree Contingencies in Advance
 - Perform Dry Runs with the Decision Makers



