CENTER FOR DRUG EVALUATION AND RESEARCH

APPROVAL PACKAGE FOR:

APPLICATION NUMBER
21-307

Chemistry Review(s)

DEC 15 2000

DIVISION OF DERMATOLOGIC AND DENTAL DRUG PRODUCTS
Review of Chemistry, Manufacturing, and Controls

NDA #: 21-307 **CHEM.REVIEW #:** 1 **REVIEW DATE:** 12/14/00

SUBMISSION/TYPE	DOCUMENT DATE	CDER DATE	ASSIGNED DATE
ORIGINAL	28-Sept-2000	29-Sept-2000	11-Oct-2000
Amendment (BC)	22-Nov-2000	24-Nov-2000	12-Nov-2000

NAME & ADDRESS OF APPLICANT: Schering-Plough HealthCare Products
3 Oak Way
Berkeley Height, NJ 07922

DRUG PRODUCT NAME

Proprietary:	None
Nonproprietary/USAN:	Butenafine HCl
Code Names/#'s:	KP-363
Chem.Type/Ther.Class:	6 S

ANDA Suitability Petition/DESI/Patent Status:
N/A

PHARMACOL.CATEGORY/INDICATION: Athlete's Foot (tinea pedis); Jock Itch (tinea cruris); Ringworm (tinea corporis)

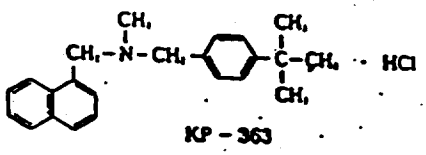
DOSAGE FORM: Cream
STRENGTHS: 1%
ROUTE OF ADMINISTRATION: Topical
DISPENSED: __ Rx _x_ OTC

CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR FORMULA, MOL.WT:

Chemical Name: N-4-t-butylbenzyl-N-methyl-1-napthalenemethylamine hydrochloride

Molecular Weight: 353.93

Molecular Formula: $C_{23}H_{27}N.HCl$



KP - 363

Structural Formula

SUPPORTING DOCUMENTS:

DMF # —

DMF — Type II

Acceptable 12/8/00

DMF — Type I

); CGMPs covers acceptability of site, and facilities, etc.

RELATED DOCUMENTS (if applicable):

IND —

NDA 20-524 ButenafineHCl Cream, 1% for the Treatment of Interdigital Tinea Pedis
NDA 20-663 ButenafineHCl Cream, 1% for the Treatment of Tinea Corporis and Cruis

Letters of Authorization: dated 5/ 23/00 (DMF #) 9/20/00 (DMF) and 8/24/00 (IND , NDAs 20-524 and 20-663)

CONSULTS: None

REMARKS/COMMENTS:

The applicant filed an NDA in accordance with 21 CFR 314.50 and agreements made during a pre-NDA meeting of 11/22/00. This NDA is the subject of marketed products for Mentax (butenafine HCl) Cream, 1% (NDA 20-524 and NDA 20-663) and is being submitted as an Rx - to- OTC. The NDA contains Clinical and Statistical Data and a brief summary of the CMCs in support of the application.

During the pre-NDA meeting of 11/22/00, the applicant was requested to submit a statement that the Chemistry, Manufacturing and Controls information for the drug substances and the drug product are the same as described in NDA 20-524 and NDA 20-663. They also were requested to give a statement that there have been no changes since the approval of these NDAs. In this regard, the applicant cross-referenced NDAs 20-524 and 20-663 for all CMC information. [Note: The CMCs were found approvable for NDA 20-524 and NDA 20-663; see Chemist Review #2 dated 2/20/96 and Chemist Review dated #1 11/5/96, respectively.

In addition, the applicant indicated that there have been no CMC changes since the approval of these NDAs and the CMCs are the same except for the following changes:

(1) Bertek Pharmaceutical has been deleted as a site for all testing, including qualification of drug substance reference standard, qualification of raw material vendor, analytical testing of raw materials or finished product, and stability evaluations.

(2) — contract laboratories have been deleted as sites for —

(3) Schering-Plough HealthCare Products has been added as a site for stability testing of the finished product.

(4) Two new package sizes (12 and 24 gram tubes) have been added. The packaging materials are identical to materials approved in NDAs 20-524 and 20-663 for the marketed tubes (2, 15, and 30 gram sizes).

Packaging Materials:

Tube: .

Packaging specifications for the new tube sizes are referenced in the tube manufacture's DMF. Authorization to refer DMF [ ] was given in this NDA.

(5) The applicant indicated that no stability data have been submitted for the 12 g and 24 g sizes since the new sizes could be bracketed between the approved marketed packages. An agreement was made during the pre- NDA meeting of 11/22/00 that no stability data would needed on the new sizes if they could be bracketed the approved marketed packages.

(6) Proposed Expiration Date and Storage Conditions:

Based on data submitted in NDA 20-524 and NDA ~~20-66~~ 20-663, a— - month expiration

date has been proposed for Butenafine HCl Cream, 1% packaged in 2 g, 12 g, 15 g, 24 g, and 30 g tubes.

The storage condition between 5^0-30^0C (41^0F-86^0F) was recommended for Butenafine HCl Cream, 1%.

(7) Updated CMC information were submitted as follows:

a. The manufacturing, processing, and packaging of Butenafine HCl Cream, 1% will be performed at:

b. Stability testing will be performed by:

Schering-Plough HealthCare Products
3030 Jackson Avenue
Memphis, Tennessee 38151

c. Microbiological testing will be performed by:

Schering-Plough HealthCare Products
4207 Michigan Avenue Rd. N.E.
Cleveland, TN 37323

Environmental Assessment: Acceptable

A type 6 NDA for Butenafine HCl Cream, 1% requires an Environmental Assessment in accordance with regulation 21 CFR Part 25.22 (a)(14). In this regard, the applicant requested a Categorical Exclusion from the Environmental Assessments under 21 CFR 25.31 (b) for this product based on information that was submitted as follows:

Butenafine HCl Cream, 1% is currently sold as an Rx product under the brand name Mentax Cream, but will be switched to OTC marketing. The applicant has provided information to justify exclusion from the requirements of an environmental assessement.. In this regard, the applicant provided data which show that butenafine HCl active moiety entry into the aquatic environment is less than 1 part per billion (see calculations as submitted in Vol. 1.2, p. 4 017).

Since the EIC value for butenafine HCl drug substance represents a level well below 1 ppb for the EIC, a claim for categorical exclusion has been requested.

Establishment Evaluation Review: Pending

EER was requested on 12/6/00 for the facilities stated above. The status as to compliance with CGMPs is pending from the Office of Compliance.

Labeling: Acceptable

The draft carton and package labeling was reviewed and found acceptable from a technical standpoint for OTC use.

CONCLUSIONS & RECOMMENDATIONS:

The NDA is recommended for approval for manufacturing and controls under section 505 of the Act pending a satisfactory EER. In addition, the labeling was found acceptable from a technical standpoint pending labeling meeting.

/S/ 12/15/00

Ernest G. Pappas, Review Chemist

cc: Orig. NDA 21-370
HFD-540/Division File
HFD-540/Chem., Pappas
HFD-540/ MO, Porres
HFD-540/Pharm, Mainigi
HFD-540/ CSO, Cross
HFD-540/Chem.Team Leader, DeCamp

ESTABLISHMENT EVALUATION REQUEST
DETAIL REPORT

Application: NDA 21307/000
Stamp: 29-SEP-2000
Regulatory Due: 29-JUL-2001
Applicant: SCHERING PLOUGH
3 OAK WAY
BERKELEY HEIGHTS, NJ
Priority: 079220603
Org Code: 3S

Action Goal:
District Goal: 30-MAY-2001
Brand Name: BUTENAFINE HCL 1% CREAM
Estab. Name:
Generic Name: BUTENAFINE HCL 1% CREAM
Dosage Form: (CREAM)
Strength: 1%

FDA Contacts: F. CROSS JR (HFD-540) 301-827-2020 , Project Manager
E. PAPPAS (HFD-540) 301-827-2066 , Review Chemist
W. DECAMP II (HFD-540) 301-827-2041 , Team Leader

Overall Recommendation:
Establishment: [redacted]

DMF No:
AADA:
Responsibilities: [redacted]
Profile: CTL
OAI Status: NONE
Estab. Comment: [redacted]

(on 06-DEC-2000 by E. PAPPAS (HFD-540) 301-827-2066)

Milestone Name	Date	Req. Type	Insp. Date	Decision & Reason	Creator
SUBMITTED TO OC	16-OCT-2000				PAPPAS
SUBMITTED TO OC	16-OCT-2000				PAPPAS
SUBMITTED TO DO	16-OCT-2000	GMP			DAMBROGIOJ

Establishment: [redacted]

DMF No:
AADA:
Responsibilities: [redacted]
Profile: OIN
OAI Status: NONE
Estab. Comment: [redacted]

on 16-OCT-2000 by J. D AMBROGIO (HFD-324) 301-827-0062)

Milestone Name	Date	Req. Type	Insp. Date	Decision & Reason	Creator
SUBMITTED TO OC	16-OCT-2000				PAPPAS
SUBMITTED TO OC	16-OCT-2000				PAPPAS
SUBMITTED TO DO	16-OCT-2000	10D			DAMBROGIOJ
DO RECOMMENDATION	25-OCT-2000			ACCEPTABLE BASED ON FILE REVIEW	JMARTIN1
DALLAS DISTRICT RECOMMENDS APPROVAL OF THIS NDA BASED ON A PREVIOUS INSPECTION CONDUCTED AT [redacted] ON 3/5/99 THAT WAS CLASSIFIED ACCEPTABLE FOR PROFILE CLASS - "OIN". A PROFILE SAMPLE WILL BE COLLECTED.					
OC RECOMMENDATION	25-OCT-2000			ACCEPTABLE	DAMBROGIOJ

30-MAY-2001

29-JUL-2001
SCHERING PLOUGH
3S
540
Priority:
Org Code:
Application Comment:

(on
16-OCT-2000 by E. PAPPAS (HFD-540) 301-827-2066)

DISTRICT RECOMMENDATION

Establishment:

DMF No: AADA:
Responsibilities:
Profile: CSN OAI Status: NONE
Estab. Comment:

Milestone Name	Date	Req. Type	Insp. Date	Decision & Reason	Creator
SUBMITTED TO OC	06-DEC-2000				PAPPAS
SUBMITTED TO DO	07-DEC-2000	GMP			EGASM
ASSIGNED INSPECTION	12-DEC-2000	GMP			EGASM

Establishment:

DMF No: AADA:
Responsibilities:
Profile: CTL OAI Status: NONE
Estab. Comment:

Milestone Name	Date	Req. Type	Insp. Date	Decision & Reason	Creator
SUBMITTED TO OC	06-DEC-2000				PAPPAS
SUBMITTED TO DO	06-DEC-2000	GMP			FERGUSONS
INSPECTION SCHEDULED	05-JAN-2001		13-APR-2001		MEDWARDS

Establishment: 1031623
SCHERING PLOUGH HEALTHCARE PRODUCTS INC
9 OLD MICHIGAN AVENUE ROAD
CLEVELAND, TN 37311
DMF No: AADA:
Responsibilities: FINISHED DOSAGE STERILITY TESTER
Profile: CTL OAI Status: NONE
Estab. Comment: THE APPLICANT PROVIDED FOR SCHERING-PLOUGH HEALTHCARE PRODUCTS,

ESTABLISHMENT EVALUATION REQUEST
DETAIL REPORT

4207 MICHIGAN AVENUE RD. N.E., CLEVELAND, TN 37323 TO PERFORM THE MICROBIOLOGICAL TESTING. THE DATA BASE INDICATED A DIFFERENT ADDRESS FOR SCHERING-PLOUGH HEALTHCARE. PLEASE CORRECT ADDRESS AS STATED IN COMMENT. (on 06-DEC-2000 by E. PAPPAS (HFD-540) 301-827-2066)

Milestone Name	Date	Req. Type	Insp. Date	Decision & Reason	Creator
SUBMITTED TO OC	06-DEC-2000				PAPPAS
SUBMITTED TO DO	07-DEC-2000	GMP			FERGUSONS

Establishment: —
—
—
—

DMF No: AADA:

Responsibilities: —

Profile: CTL OAI Status: NONE

Estab. Comment:

Milestone Name	Date	Req. Type	Insp. Date	Decision & Reason	Creator
SUBMITTED TO OC	06-DEC-2000				PAPPAS
SUBMITTED TO OC	06-DEC-2000				PAPPAS
SUBMITTED TO DO	06-DEC-2000	GMP			FERGUSONS
ASSIGNED INSPECTION	'02-JAN-2001	PS			CEVERLY

APPEARS THIS WAY ON ORIGINAL

DIVISION OF DERMATOLOGIC AND DENTAL DRUG PRODUCTS
Review of Chemistry, Manufacturing, and Controls

NDA #: 21-307 **CHEM.REVIEW #:** 2 **REVIEW DATE:** 7/14/00

SUBMISSION/TYPE	DOCUMENT DATE	CDER DATE	ASSIGNED DATE
ORIGINAL	28-Sept-2000	29-Sept-2000	11-Oct-2000 (Rv.1)
Amendment (BC)	22-Nov-2000	24-Nov-2000	12-Nov-2000 (Rv.1)
Amendment (BL)	08-Jun-2001	11-Jun-2001	17-Jul- 2001 (Rv.2)

NAME & ADDRESS OF APPLICANT: Schering-Plough HealthCare Products
3 Oak Way
Berkeley Height, NJ 07922

DRUG PRODUCT NAME

Proprietary:	None
Nonproprietary/USAN:	Butenafine HCl
Code Names/#'s:	KP-363
Chem.Type/Ther.Class:	6 S

ANDA Suitability Petition/DESI/Patent Status:
N/A

PHARMACOL.CATEGORY/INDICATION: Athlete's Foot (tinea pedis); Jock Itch (tinea cruris); Ringworm (tinea corporis)

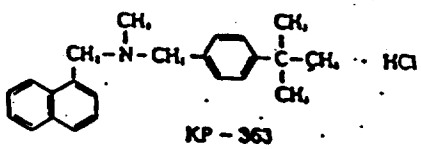
DOSAGE FORM: Cream
STRENGTHS: 1%
ROUTE OF ADMINISTRATION: Topical
DISPENSED: ___ Rx _x_ OTC

CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR FORMULA, MOL.WT:

Chemical Name: N-4-t-butylbenzyl-N-methyl-1-napthalenemethylamine hydrochloride

Molecular Weight: 353.93

Molecular Formula: $C_{23}H_{27}N.HCl$



Structural Formula

SUPPORTING DOCUMENTS:

DMF

DMF # Type II
); acceptable 12/8/00

DMF # Type I

RELATED DOCUMENTS (if applicable):

IND

NDA 20-524 ButenafineHCl Cream, 1% for the Treatment of Interdigital Tinea Pedis
NDA 20-663 ButenafineHCl Cream, 1% for the Treatment of Tinea Corporis and Cruis

Letters of Authorization: dated 5/ 23/00 (DMF # 9/20/00 (DMFs
and 8/24/00 (IND NDAs 20-524 and 20-663)

CONSULTS: The original labeling was sent to DDMAC and OPDRA for consult. However, the revised labeling was not sent to DDMAC and OPDRA.

REMARKS/COMMENTS:

The applicant amended their NDA on 6/8/01 with labeling changes in response to Agency's request of 3/2/01. This chemistry review (#2) covers only the technical portion of the labeling changes. In this regard, the original labeling was found acceptable from a technical standpoint with one exception. The carton labeling was found not acceptable because the font size for the tradename was more than half as large as the non-proprietary name. Therefore, the applicant submitted a mock- up copy of the carton labeling that adequately contained the correct font size for the tradename and non-proprietary name as required by 21 CFR 202.1(b) 1.

CONCLUSIONS & RECOMMENDATIONS:

The NDA is recommended for approval for manufacturing and controls under section 505 of the Act pending a satisfactory EER. In addition, the revised labeling, which was submitted on 6/08/01, was found acceptable from a technical standpoint. However, the final decision as to the adequacy of the revised labeling will be deferred to DOTCDP.

/S/ 7/20/01

Ernest G. Pappas, Review Chemist

cc: Orig. NDA 21-307
HFD-540/Division File
HFD-540/Chem., Pappas
HFD-540/ MO, Porres
HFD-540/Pharm, Mainigi
HFD-540/ CSO, Cross
HFD-540/Chem.Team Leader, DeCamp

DIVISION OF DERMATOLOGIC AND DENTAL DRUG PRODUCTS
Review of Chemistry, Manufacturing, and Controls

NDA #: 21-307 **CHEM.REVIEW #:** 3 **REVIEW DATE:** 7/23/01

SUBMISSION/TYPE	DOCUMENT DATE	CDER DATE	ASSIGNED DATE
ORIGINAL	28-Sept-2000	29-Sept-2000	11-Oct-2000 (Rv.1)
Amendment (BC)	22-Nov-2000	24-Nov-2000	12-Nov-2000 (Rv.1)
Amendment (BL)	08-Jun-2001	11-Jun-2001	17-Jul- 2001 (Rv.2)
Amendment (BC)	19-Jul 2001	20-Jul-2001	23-Jul- 2001 (Rv.3)

NAME & ADDRESS OF APPLICANT: Schering-Plough HealthCare Products
3 Oak Way
Berkeley Height, NJ 07922

DRUG PRODUCT NAME

Proprietary:	None
Nonproprietary/USAN:	Butenafine HCl
Code Names/#'s:	KP-363
Chem.Type/Ther.Class:	6 S

ANDA Suitability Petition/DESI/Patent Status:
N/A

PHARMACOL.CATEGORY/INDICATION: Athlete's Foot (tinea pedis); Jock Itch (tinea cruris); Ringworm (tinea corporis)

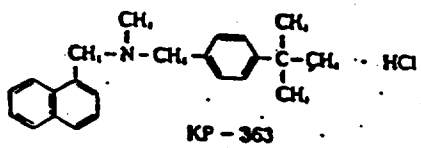
DOSAGE FORM: Cream
STRENGTHS: 1%
ROUTE OF ADMINISTRATION: Topical
DISPENSED: __ Rx _x_ OTC

CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR FORMULA, MOL.WT:

Chemical Name: N-4-t-butylbenzyl-N-methyl-1-napthalenemethylamine hydrochloride

Molecular Weight: 353.93

Molecular Formula: $C_{23}H_{27}N.HCl$



Structural Formula

SUPPORTING DOCUMENTS:
DMF #

DMF # Type II
; acceptable 12/8/00
DMF # Type I

RELATED DOCUMENTS (if applicable):

IND[ ]:
NDA 20-524 ButenafineHCl Cream, 1% for the Treatment of Interdigital Tinea Pedis
NDA 20-663 ButenafineHCl Cream, 1% for the Treatment of Tinea Corporis and Cruis

Letters of Authorization: dated 5/ 23/00 (DMF[ ]9/20/00 (DMFs[ ]
and 8/24/00 (IND[ ]NDAs 20-524 and 20-663)

CONSULTS: The original labeling was sent to DDMAC and OPDRA for consult. However, the revised labeling was not sent to DDMAC and OPDRA.

REMARKS/COMMENTS:

Schering-Plough HealthCare Products amended their NDA on 7/19/01 to delete Bertek Pharmaceuticals Inc., Foster City, CA and
as control sites for respectively.

This chemistry review also covers the EER report dated 7/23/01 from the Office of Compliance. An overall recommendation to withhold approval was indicated by the Office of Compliance because the inspection of the facilities, was found unacceptable for CGMPs. This EER report is summarized as follows:

23-JUL-2001 FDA CDER EES Page 1 of 4
ESTABLISHMENT EVALUATION REQUEST
DETAIL REPORT

Application: NDA 21307/000
Stamp: 29-SEP-2000
Regulatory Due: 29-JUL-2001
Applicant: SCHERING PLOUGH
3 OAK WAY
BERKELEY HEIGHTS, NJ
Priority: 079220603
Org Code: 3S

Action Goal:
District Goal: 30-MAY-2001
Brand Name: BUTENAFINE HCL 1% CREAM
Estab. Name:
Generic Name: BUTENAFINE HCL 1% CREAM
Dosage Form: (CREAM)
Strength: 1%

FDA Contacts: F. CROSS JR (HFD-540) 301-827-2020 , Project Manager
E. PAPPAS (HFD-540) 301-827-2066 , Review Chemist
W. DECAMP II (HFD-540) 301-827-2041 , Team Leader

Overall Recommendation: WITHHOLD on 23-JUL-2001 by M. GARCIA (HFD-322) 301-594-0095

Establishment: [redacted]

DMF No: AADA:
Responsibilities: [redacted]

Profile: OIN OAI Status: NONE
Estab. Comment: [redacted]

OCT-2000 by J. D AMBROGIO (HFD-324) 301-827-0062) (on 16-

Milestone Name	Date	Req. Type	Insp. Date	Decision & Reason	Creator
SUBMITTED TO OC	16-OCT-2000				PAPPAS
SUBMITTED TO OC	16-OCT-2000				PAPPAS
SUBMITTED TO DO	16-OCT-2000	10D			DAMBROGIOJ
DO RECOMMENDATION	25-OCT-2000			ACCEPTABLE BASED ON FILE REVIEW	JMARTIN1
DALLAS DISTRICT RECOMMENDS APPROVAL OF THIS NDA BASED ON A PREVIOUS INSPECTION CONDUCTED AT ON 3/5/99 THAT WAS CLASSIFIED ACCEPTABLE FOR PROFILE CLASS - "OIN". A PROFILE SAMPLE WILL BE COLLECTED.					
OC RECOMMENDATION	25-OCT-2000			ACCEPTABLE DISTRICT RECOMMENDATION	DAMBROGIOJ

Establishment: [redacted]

DMF No: AADA:
Responsibilities: [redacted]

Profile: CSN OAI Status: POTENTIAL OAI
Estab. Comment:

Milestone Name	Date	Req. Type	Insp. Date	Decision & Reason	Creator
SUBMITTED TO OC	06-DEC-2000				PAPPAS
SUBMITTED TO DO	07-DEC-2000	GMP			EGASH
ASSIGNED INSPECTION	12-DEC-2000	GMP			EGASH
INSPECTION SCHEDULED	13-APR-2001		18-MAY-2001		IRIVERA
INSPECTION PERFORMED	21-MAY-2001		18-MAY-2001		EGASH
DO RECOMMENDATION	23-JUL-2001			WITHHOLD PEND REG ACTION - WARNING LTR	EGASH
OC RECOMMENDATION	23-JUL-2001			WITHHOLD	EGASH

30-MAY-2001

29-JUL-2001
SCHERING PLOUGH
3S
540
Priority:
Org Code:
Application Comment:

16-OCT-2000 by E. PAPPAS (HFD-540) 301-827-2066) (on

DISTRICT RECOMMENDATION
WARNING LETTER ISSUED

Establishment:

DMF No: AADA:
Responsibilities:
Profile: CTL OAI Status: NONE
Estab. Comment:

(on 06-DEC-2000 by E. PAPPAS (HFD-540) 301-827-2066)

Milestone Name	Date	Req. Type	Insp. Date	Decision & Reason	Creator
SUBMITTED TO OC	06-DEC-2000				PAPPAS
SUBMITTED TO DO	06-DEC-2000	GMP			FERGUSONS
INSPECTION SCHEDULED	05-JAN-2001		13-APR-2001		MEDWARDS
ASSIGNED INSPECTION	'14-JUN-2001	PS			MEDWARDS
ASSIGNED INSPECTION	'14-JUN-2001	PS			MEDWARDS
DO RECOMMENDATION	12-JUL-2001			WITHHOLD FIRM NOT READY	MEDWARDS
FIRM IS CURRENTLY MOVING TO NORTH CARLOINA AND WOULD LIKE TO REQUEST AN INSPECTION AT THEIR NEW FACILTIY.					
OC RECOMMENDATION	16-JUL-2001			WITHHOLD FIRM NOT READY	DAMBROGIOJ
FIRM IS MOVING TO NC AND WOULD LIKE TO HAVE INSPECTION SCHEDULED AT NEW LOCATION.					

Establishment: 1031623
SCHERING PLOUGH HEALTHCARE PRODUCTS INC
9 OLD MICHIGAN AVENUE ROAD
CLEVELAND, TN 37311
DMF No: AADA:
Responsibilities: FINISHED DOSAGE STERILITY TESTER
Profile: CTL OAI Status: NONE
Estab. Comment: THE APPLICANT PROVIDED FOR SCHERING-PLOUGH HEALTHCARE PRODUCTS, 4207 MICHIGAN AVENUE RD. N.E., CLEVELAND, TN 37323 TO PERFORM THE MICROBIOLOGICAL TESTING. THE DATA BASE INDICATED A DIFFERENT ADDRESS FOR SCHERING-PLOUGH HEALTHCARE. PLEASE CORRECT ADDRESS AS

STATED IN COMMENT. (on 06-DEC-2000 by E. PAPPAS (HFD-540) 301-827-2066)

Milestone Name	Date	Req. Type	Insp. Date	Decision & Reason	Creator
SUBMITTED TO OC	06-DEC-2000				PAPPAS
SUBMITTED TO DO	07-DEC-2000	GMP			FERGUSONS
DO RECOMMENDATION	23-MAR-2001			ACCEPTABLE	MCLENDEN
				BASED ON FILE REVIEW	
NOL-DO/NSV-BR PERFORMED A GMP INSPECTION AT THIS FACILITY ON 9/18-22/00 WHICH WAS CLASSIFIED VAI. THIS APPLICATION IS APPROVABLE.					
OC RECOMMENDATION	26-MAR-2001			ACCEPTABLE	DAMBROGIOJ
				DISTRICT RECOMMENDATION	

Establishment: 1020060
SCHERING-PLOUGH HEALTHCARE
3030 JACKSON AVE
MEMPHIS, TN 38151
DMF No: AADA:
Responsibilities: FINISHED DOSAGE STABILITY TESTER
Profile: CTL QAI Status: NONE
Estab. Comment: I HAVE DISCOVERED THAT BERTEK PHARMACEUTICALS INC . FORMERLY PENEDERM PHARMACEUTICALS, WILL

(on 06-DEC-2000 by E. PAPPAS (HFD-540) 301-827-2066)

Milestone Name	Date	Req. Type	Insp. Date	Decision & Reason	Creator
SUBMITTED TO OC	16-OCT-2000				PAPPAS
SUBMITTED TO OC	16-OCT-2000				PAPPAS
SUBMITTED TO DO	16-OCT-2000	GMP			DAMBROGIOJ
ASSIGNED INSPECTION	23-MAR-2001	PS			MCLENDEN
INSPECTION SCHEDULED	28-MAR-2001		15-MAY-2001		MCLENDEN
DO RECOMMENDATION	05-JUN-2001			ACCEPTABLE	MCLENDEN
				INSPECTION	
CSO GEORGE FLYNN CONDUCTED AN INSPECTION AT SCHERING-PLOUGH HEALTHCARE. 3030 JACKSON AVE., MEMPHIS, TN 5/23-25/01. AT THIS ADDRESS. THE EIR IS CLASSIFIED VAI, AND THIS NDA IS APPROVABLE.					
OC RECOMMENDATION	05-JUN-2001			ACCEPTABLE	DAMBROGIOJ
				DISTRICT RECOMMENDATION	

Establishment:

DMF No: AADA:
Responsibilities:
Profile: CTL QAI Status: NONE
Estab. Comment:

Milestone Name	Date	Req. Type	Insp. Date	Decision & Reason	Creator
SUBMITTED TO OC	06-DEC-2000				PAPPAS
SUBMITTED TO OC	06-DEC-2000				PAPPAS
SUBMITTED TO DO	06-DEC-2000	GMP			FERGUSONS
ASSIGNED INSPECTION	02-JAN-2001	PS			CEVERLY
INSPECTION SCHEDULED	14-MAR-2001		22-MAR-2001		CEVERLY

23-JUL-2001 FDA CDER EES Page 4 of 4
ESTABLISHMENT EVALUATION REQUEST
DETAIL REPORT

INSPECTION PERFORMED	21-MAR-2001	20-MAR-2001		CEVERLY
DO RECOMMENDATION	21-MAR-2001		ACCEPTABLE	CEVERLY
			INSPECTION	

THE FIRM IS ACCEPTABLE.

CARYN EVERLY
PAI MANAGER

OC RECOMMENDATION	22-MAR-2001	ACCEPTABLE	DAMBROGIOJ
		DISTRICT RECOMMENDATION	

CONCLUSIONS & RECOMMENDATIONS:

An approvable action is recommended for the manufacturing and controls under section 505 of the Act since the Office of Compliance has recommended a withhold approval of the NDA (see attached EER above).

/S/ 7/23/01

Ernest G. Pappas, Review Chemist

cc: Orig. NDA 21-307
HFD-540/Division File
HFD-540/Chem., Pappas
HFD-540/ MO, Porres
HFD-540/Pharm, Mainigi
HFD-540/ CSO, Cross
HFD-540/Chem.Team Leader, DeCamp

Redacted 12

pages of trade

secret and/or

confidential

commercial

information