

CENTER FOR DRUG EVALUATION AND RESEARCH

APPROVAL PACKAGE FOR:

APPLICATION NUMBER

21-425

Chemistry Review(s)

NDA 21-425

**ULTRAVIST™ (Iopromide) Injection
Pharmacy Bulk Package , 500 mL**

300 mgI/mL and 370 mgI/mL

For Intravenous Administration

Berlex Laboratories, Inc.

**Milagros Salazar, Ph.D.
Division of Medical Imaging and Radiopharmaceutical DPs
HFD-160**

Table of Contents

| | |
|--|----|
| Table of Contents..... | 2 |
| Chemistry Review Data Sheet..... | 4 |
| The Executive Summary..... | 6 |
| I. Recommendations..... | 6 |
| A. Recommendation and Conclusion on Approvability..... | 6 |
| B. Recommendation on Phase 4 (Post-Marketing) Commitments, Agreements, and/or Risk Management Steps, if Approvable..... | 6 |
| II. Summary of Chemistry Assessments..... | 6 |
| A. Description of the Drug Product(s) and Drug Substance(s)..... | 6 |
| B. Description of How the Drug Product is Intended to be Used..... | 6 |
| C. Basis for Approvability or Not-Approval Recommendation..... | 7 |
| III. Administrative..... | 7 |
| A. Reviewer's Signature..... | 7 |
| B. Endorsement Block..... | 7 |
| C. CC Block..... | 7 |
| Chemistry Assessment..... | 8 |
| I. Review Of NDA Body Of Data..... | 8 |
| A. DRUG SUBSTANCE (Iopromide) | |
| DESCRIPTION & CHARACTERIZATION: Adequate..... | 8 |
| 2. MANUFACTURER: Adequate..... | 8 |
| 3. SYNTHESIS: Adequate..... | 8 |
| 4. SPECIFICATIONS/TEST METHODS/REF.STD.: Adequate..... | 8 |
| 5. CONTAINER/CLOSURE SYSTEM: Adequate..... | 8 |
| 6. STABILITY: Adequate..... | 8 |
| B. DRUG PRODUCTS (Ultravist Inj. PBP, 300 & 370 mg/mL) | |
| 1. COMPONENTS/COMPOSITION: Adequate..... | 9 |
| 2. SPECIFICATIONS & METHODS FOR INGREDIENTS: Adequate,..... | 9 |
| 3. MANUFACTURER: Adequate..... | 9 |
| 4. MANUFACTURING AND PACKAGING: Adequate,..... | 9 |
| 5. SPECIFICATIONS AND TEST METHODS: Adequate..... | 11 |

6. CONTAINER/CLOSURE SYSTEM: Adequate..... 11

7. STABILITY: Adequate (supporting 36 mo. storage/10 hrs. after first puncture)....12

I.

II. Review Of NDA

C. INVESTIGATIONAL FORMULATIONS: Adequate14

D. ENVIRONMENTAL ASSESSMENT: Adequate14

E. METHODS VALIDATION: Adequate.....14

F. LABELING: Adequate.....14

G. ESTABLISHMENT INSPECTION: Overall Recommendations: Pending14

III. List Of Deficiencies To Be Communicated.....14

H. DEFICIENCY LETTER TO APPLICANT: YES.....14

ATTACHMENTS

- ATTACHMENT 1 –Regulatory Tests & Limits
- ATTACHMENT 2 –Stability –representative data
- ATTACHMENT 3 –Stability protocol
- ATTACHMENT 4 – Copy of labels
- ATTACHMENT 5 -EER-Summary report

CHEMISTRY NDA REVIEW DATA SHEET

1. NDA #: 21-425
2. REVIEW DATE: 5-JUL-2002, 19-Jul-02 rev
3. REVIEW #: 1
4. REVIEWER: Milagros Salazar, Ph.D.
5. PREVIOUS DOCUMENTS: None

6. SUBMISSION(S) BEING REVIEWED: Original

| <u>Submission(s) Reviewed</u> | <u>Document Date</u> |
|-------------------------------|----------------------|
| Original | 21-NOV-2001 |
| Amendment N-000 BZ | 10-JAN-2002 |

7. NAME & ADDRESS OF APPLICANT: BERLEX LABORATORIES, INC.
340 Changebridge Rd.
Montville, NJ 07450-1000

8. DRUG PRODUCT NAME/CODE/TYPE:

| | |
|-------------------------------|---|
| Proprietary Name | ULTRAVIST® Injection, Pharmacy Bulk Package |
| Non-Proprietary Name (USAN) | Iopromide |
| Code Name/#: | ZK 35 760 |
| Chem.Type/Submission Priority | 3 S |

9. LEGAL BASIS FOR SUBMISSION: NA

10. PHARMACOL. CATEGORY/INDICAT.: Aortography; Visceral Angiography; Coronary Arteriography/left Ventriculography; Cerebral Arteriography; Peripheral Arteriography; Contrast Enhanced Computed Tomography (Head and Body); Excretory Urography

11. DOSAGE FORM: Injection, Pharmacy Bulk Package (500 mL bottle)

12. STRENGTH/POTENCY: 300 and 370 mg/mL

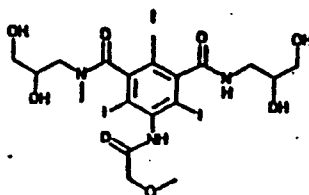
13. ROUTE OF ADMINISTRATION: Intravenous

14. Rx/OTC: Rx OTC

15. SPOTS (Special Products On-line Tracking): Yes No

16. CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR FORMULA, MOLECULAR WEIGHT:

N,N'-Bis(2,3-dihydroxypropyl)-2,4,6-triiodo-5-(2-methoxyacetamido)-N-methylisophthalamide
C₁₈H₂₄I₃N₃O₈ MW 791.12 Iodine content: 48.12%



17. RELATED/SUPPORTING DOCUMENTS:

A. DMFs:

| DMF # | TYPE | HOLDER | ITEM | STATUS | REVIEW DATE | COMMENTS |
|-------|------|-------------|-----------|------------|--|----------------|
| | II | Schering AG | Iopromide | Acceptable | 30-DEC-1998 18-SEP-2000 ¹ 8-APR-2002 ² | Drug Substance |

B. Other Documents:

| DOCUMENT | APPLICATION NUMBER | DESCRIPTION |
|----------|---|--|
| NDA | 20-220 / Berlex Labs., Inc. ¹ SCP-011 approved (4-Jan-01) | |
| | 20-220/Berlex Labs., Inc. ² SCM-013 approved (11-Apr-02) | |
| NDA | 20-220 / Berlex Labs., Inc. ¹ SCP-011 approved (4-Jan-01) | 500mL bottle clear, colorless. USP Type II glass |
| NDA | 20-220 / Berlex Labs., Inc. ¹ SCP-011 approved (4-Jan-01) | |

18. STATUS OF CONSULTS:

| CONSULTS/CMC RELATED REVIEWS | RECOMMENDATION | DATE | REVIEWER |
|------------------------------|--|--|-------------------------------------|
| EES | <u>Overall</u> : Pending <u>Berlex</u> - acceptable <u>Schering AG Wedding</u> - acceptable <u>Schering AG Charlottenburg</u> - pending | Requested : 12-FEB-2002 Final : pending (as of 19-Jul-02) | DO- IRivera CDER-OC - JDambrogio |
| Biostatistics | NA | | |
| EA | Categorical Exclusion | 12 -JUL-2002 | Milagros Salazar, Ph.D. |
| Microbiology | Approvable | 11-MAR-2002 | Stephen E. Langille, Ph.D. |
| Biopharm | NA | | |
| Other | NA | | |

Patent/Trademark: Patent no. 4,364,921 Expiration Date: 06-MAR-2005 Type of patent: Formulation, Composition & Method of use of Ultravist (iopromide) Injection Pharmacy Bulk Package.
Patent owner: Schering AG

19. ORDER OF REVIEW: NA

CHEMISTRY EXECUTIVE SUMMARY

I. Recommendations

A. Recommendations and Conclusions on Approvability

Based on the chemistry section, *ULTRAVIST*® Inj., Pharmacy Bulk Package (300 and 370 mgI/mL) is recommended for APPROVAL pending an overall status of acceptability of cGMPs for the manufacturing facilities involved.

B. Recommendations on Phase 4 (post-marketing) Commitments: NONE

II. Summary of Chemistry Assessments

A. Description of the Drug Product and Drug Substance

ULTRAVIST® (iopromide) Injection, Pharmacy Bulk Package is used as an X-ray contrast agent for intravascular administration during indicated X-Ray imaging diagnostic procedures.

ULTRAVIST® is supplied in two strengths, 300 and 370 mgI/mL in 500 mL glass bottle. Each bottle is to be used as a Pharmacy Bulk Package for dispensing multiple single doses.

ULTRAVIST® Injection is a nonionic, sterile, clear, colorless to slightly yellow, odorless, pyrogen-free aqueous solution of iopromide. Solutions of Ultravist Injection 300 mgI/mL and 370 mgI/mL have osmolalities of 607 and 774 mOsmol/kg water @ 37 °C respectively and are approximately 2.1 to 2.7 times that of plasma (285 mOsmol/kg water).

The drug substance iopromide is a nonionic aromatic iodinated compound with a molecular weight of 791.12, a molecular formula of C₁₆H₂₄I₃N₃O₈ and has an Iodine content of 48.12%.

The chemistry, manufacturing and controls for the both iopromide drug substance and Ultravist drug products 150, 240, 300 and 370 mgI/mL are covered under Type II DMF [] and NDA 20-220 respectively. By reference to those applications, this NDA has provided all regulatory specification and controls.

The differences between the currently approved Ultravist products and those covered in this application are their use (single use vs. multiple use) and their size presentations (50 mL, 100mL, 150mL and 250mL vials vs. 500mL bottle). This application provides description and control information for the new 500 mL bottle container-closure, and stability of the Ultravist 300 and 370 mgI/mL Injection with full term stability data in support of 36 months expiry time proposed for these products.

ULTRAVIST® Injection, PBP, products are supplied as follows:

| | |
|------------|--|
| 300 mgI/mL | 1 x 500 mL bottles NDC 50419-344-XX |
| | 8 x 500 mL bottles ... NDC 50419-344-XX |
| 370 mgI/mL | 1 x 500 mL bottles NDC 50419-346-XX |
| | 8 x 500 mL bottles ... NDC 50419-346-XX |

B. Descriptions of How the Drug Product is Intended to be Used

ULTRAVIST® Injection, PBP, 300 and 370 mgI/mL products are intended for dispensing multiple single dose preparations using a suitable transfer device. Ultravist is intended for intra-arterial

and intravenous administration. It is contraindicated for intrathecal use. It is indicated for cerebral and peripheral arteriography; for coronary arteriography and left ventriculography, visceral angiography and aortography; for contrast enhanced computed tomography (CECT) imaging of the head and body, and excretory urography. The recommended concentration and dose are posted in the package insert for both adults and pediatric populations. The maximum recommended dose of iodine (gI) in adults is 86 grams. *ULTRAVIST*® must be used within 10 hours after first punctured. Any unused portion should be discarded. Storage conditions for the kit components and constituted product at 25°C with excursions between 15°- 30°C (59°- 86°F).

C. Basis for Approvability or Not-approvability Recommendation

The recommendation for approval is based on the following:

1. The Ultravist 300 and 370 mgI/mL products have been marketed as single dose preparations since the approval of NDA 20-220 on 14-Jun-1993. The chemistry, manufacturing, controls history is well documented for these products.
2. Adequate information and data on the new container-closure system, 500mL infusion bottle (clear colorless, glass Type II); the rubber stopper (and the cap
3. The stability data and studies are adequate in support of 36 months at CRT storage of *ULTRAVIST*® Injection, PBP, 300 & 370 mgI/mL products. Shelf-life of 10 hours after first entry based on preservative effectiveness studies. See Microbiology review dated 11-Mar-02.
4. PENDING an Establishment Evaluation report overall acceptable status: Berlex and Schering AG -Wedding plant acceptable as of 14-Feb-02; Schering AG-Charlottenburg plant is pending as 19-Jul-02.

III. Administrative

Milagros Salazar, Ph.D.
Review Chemist, HFD-820/160

Eldon Leutzinger, Ph.D.
Chemistry Team Leader, HFD-820/160

cc:

Org. NDA 21-425
HFD-160/Division File
HFD-160/Salazar/Leutzinger
HFD-160/ Nguyen

filename: N21-425ultravist-PBP.doc

Redacted 34

pages of trade

secret and/or

confidential

commercial

information

23 pages redacted from this section of
the approval package consisted of draft labeling

ESTABLISHMENT EVALUATION REQUEST SUMMARY REPORT

Application: NDA 21425/000
Stamp: 21-NOV-2001 Regulatory Due: 21-SEP-2002
Applicant: BERLEX LABS
340 CHANGEBRIDGE RD
MONTVILLE, NJ 070451000

Priority: S
Action Goal:
Brand Name: ULTRAVIST(IOPROMIDE)300MGL/M
L/370MGL/ML
Established Name:
Generic Name: IOPROMIDE
Dosage Form: INJ (INJECTION)
Strength: 300 AND 370 MG I/ML

Org Code: 160
District Goal: 23-JUL-2002

FDA Contacts: T. NGUYEN (HFD-160) 301-827-7510, Project Manager
M. SALAZAR DRIVER (HFD-160) 301-827-7510, Review Chemist
E. LEUTZINGER (HFD-160) 301-827-7510, Team Leader

Overall Recommendation:

Establishment: 2243252 DMF No:
BERLEX LABORATORIES INC SUB S AADA No:
300 FAIRFIELD RD
WAYNE, NJ 074707358

Profile: CTL OAI Status: NONE Responsibilities: FINISHED DOSAGE RELEASE
Last Milestone: OC RECOMMENDATION TESTER
Milestone Date: 13-FEB-2002
Decision: ACCEPTABLE
Reason: BASED ON PROFILE

Establishment: 9610131 DMF No:
SCHERING AG AADA No:
MULLERSTRASSE 170-178
WEDDING, BERLIN, GM

Profile: CTL OAI Status: NONE Responsibilities: FINISHED DOSAGE RELEASE
Last Milestone: OC RECOMMENDATION TESTER
Milestone Date: 14-FEB-2002
Decision: ACCEPTABLE
Reason: DISTRICT RECOMMENDATION

Establishment: 9611633 DMF No:
SCHERING AG AADA No:
MAX DORN STRABE 8-10
CHARLOTTENBURG, BERLIN, GM D

Profile: LVP OAI Status: NONE Responsibilities: FINISHED DOSAGE
Last Milestone: INSPECTION SCHEDULED MANUFACTURER
Milestone Date: 12-JUN-2002

FDA CDER EES
ESTABLISHMENT EVALUATION REQUEST
SUMMARY REPORT

**APPEARS THIS WAY
ON ORIGINAL**



**This is a representation of an electronic record that was signed electronically and
this page is the manifestation of the electronic signature.**

/s/

Milagros Salazar
7/19/02 02:27:10 PM
CHEMIST

Approval recommended, with letter to the sponsor.

Eldon Leutzinger
7/22/02 12:36:29 PM
CHEMIST

I concur with all conclusions in the review, and
the recommendation of APPROVAL pending a determination of
acceptability of cGMP's, based on chemistry.