CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

74726

CHEMISTRY REVIEW(S)

ANDA APPROVAL SUMMARY

ANDA:74-726 DRUG PRODUCT:Potassium Chloride Extended-release Tablets USP

FIRM:Upsher-Smith DOSAGE FORM:Tablets STRENGTH:20 mEq

CGMP STATEMENT/EIR UPDATE STATUS: EER update pending.
BIO STUDY: Satisfactory per Bio review dated 3/12/98 (M.Park).

VALIDATION - (DESCRIPTION OF DOSAGE FORM SAME AS FIRM'S): N/A
Compendial product. FDA MV not needed.

STABILITY - (ARE CONTAINERS USED IN STUDY IDENTICAL TO THOSE IN CONTAINER SECTION?):

Satisfactory data is provided for the largest and smallest bottle, the unit dose package and for the bulk container of tablets for the biobatch, lot #15112.

Containers used in the study are identical to those in the container section. Note: Firm requested withdrawal of the bulk container of tablets in an amendment dated 7/2/96.

LABELING: Satisfactory per Labeling review dated 8/7/96 (C.Park).

STERILIZATION VALIDATION (IF APPLICABLE): N/A

SIZE OF BIO BATCH - (FIRM'S SOURCE OF NDS O.K.?):

Biobatch granule: lots #B940456-B940461 kg per lot)

Biobatch compression: lot #15112 tablets)

The biobatch was manufactured on the production scale using production equipment (i.e., kg granulation and tablets).

NDS source: Co (DMF OK

SIZE OF STABILITY BATCHES - (IF DIFFERENT FROM BIO BATCH WERE THEY MANUFACTURED VIA THE SAME PROCESS?):

Same as the biobatch.

PROPOSED PRODUCTION BATCH - (MANUFACTURING PROCESS THE SAME AS BIO/STABILITY?):

Production batch size: Same batch size as the biobatch.

Manufacturing processes for both the biobatch and the production batch are identical.

REVIEWER: DATE COMPLETED:
J.Fan 10/8/98
HFD-623/J.Fan /S/ 10/8/98
HFD-623/V.Sayeed, Ph.D.
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F/T by

ANDA APPROVAL SUMMARY

ANDA:74-726 DRUG PRODUCT:Potassium Chloride Extended-release Tablets USP

FIRM:Upsher-Smith DOSAGE FORM:Tablets STRENGTH:20 mEq

CGMP STATEMENT/EIR UPDATE STATUS: EER acceptable as of 12/5/96.

BIO STUDY: Satisfactory per Bio review dated 8/1/96

VALIDATION - (DESCRIPTION OF DOSAGE FORM SAME AS FIRM'S): N/A
Compendial product. FDA MV not needed.

STABILITY - (ARE CONTAINERS USED IN STUDY IDENTICAL TO THOSE IN CONTAINER SECTION?):

Satisfactory data is provided for the largest and smallest bottle, the unit dose package and for the bulk container of tablets for the biobatch, lot #15112.

Containers used in the study are identical to those in the container section. Note: Firm requested withdrawal of the bulk container of 5000 tablets in an amendment dated 7/2/96.

LABELING: Satisfactory per Labeling review dated 8/7/96 (C.Park).

STERILIZATION VALIDATION (IF APPLICABLE): N/A

SIZE OF BIO BATCH - (FIRM'S SOURCE OF NDS O.K.?):

Biobatch granule: lots #B940456-B940461 kg per lot)

Biobatch compression: lot #15112 (tablets)

The biobatch was manufactured on the production scale using production equipment (i.e., kg granulation and tablets).

NDS source: (DMF OK

SIZE OF STABILITY BATCHES - (IF DIFFERENT FROM BIO BATCH WERE THEY MANUFACTURED VIA THE SAME PROCESS?):

Same as the biobatch.

PROPOSED PRODUCTION BATCH - (MANUFACTURING PROCESS THE SAME AS BIO/STABILITY?):

Production batch size: Same batch size as the biobatch.

Manufacturing processes for both the biobatch and the production batch are identical.

REVIEWER: DATE COMPLETED:
J.Fan 11/8/96
HFD-623/J.Fan/11-12-96 JS 12/16/96
HFD-623/V.Sayeed, Ph.D./11-14-96
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F/T by MM December 9, 1996

1. CHEMISTRY REVIEW NO. 1 2. ANDA # 74-726

3. NAME AND ADDRESS OF APPLICANT
Upsher-Smith Laboratories, Inc.
Attention: Mark S. Robbins, Ph.D.
14905 23rd Avenue North
Minneapolis, MN 55447

4. BASIS OF SUBMISSION **Paragraph IV** certification
Key Pharmaceutical's K-DUR® pat. #4863743, exp. Sept. 6, 2006.

5. SUPPLEMENT(s) N/A
6. PROPRIETARY NAME Klor-Con® M20
7. NONPROPRIETARY NAME
Potassium Chloride Extended-release Tablets USP

8. SUPPLEMENT(s) PROVIDE(s) FOR: N/A
9. AMENDMENTS AND OTHER DATES:
August 8, 1995 Date of application
October 12, 1995 Withdrawal of 10mEq strength
December 18, 1995 **Notice of Patent Infringement Lawsuit.**

10. PHARMACOLOGICAL CATEGORY
11. Rx or OTC Rx 12. RELATED IND/NDA/DMF(s) See sec. 37
13. DOSAGE FORM oral ER tablet 14. POTENCY **20mEq (1500mg)**
15. CHEMICAL NAME AND STRUCTURE As per USAN
16. RECORDS AND REPORTS N/A

17. COMMENTS Several deficiencies in bold throughout this review.

18. CONCLUSIONS AND RECOMMENDATIONS **NA major**

19. REVIEWER: Jon E. Clark DATE COMPLETED: February 13, 1996

cc: ANDA 74-726
DUP Jacket
Division File

Endorsements:
HFD-623/J.Clark/ /S/ 2-13-96
HFD-623/A.Rudman, Ph.D./Acting Supervisor/ /S/ 2/26/96
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Chem Review #1

1. CHEMISTRY REVIEW NO. 2 2. ANDA # 74-726

3. NAME AND ADDRESS OF APPLICANT
Upsher-Smith Laboratories, Inc.
Attention: Mark S. Robbins, Ph.D.
14905 23rd Avenue North
Minneapolis, MN 55447

4. BASIS OF SUBMISSION **Paragraph IV** certification
Key Pharmaceutical's K-DUR® pat. #4863743, exp. Sept. 5, 2006.

5. SUPPLEMENT(s) N/A
6. PROPRIETARY NAME Klor-Con® M20
7. NONPROPRIETARY NAME
Potassium Chloride Extended-release Tablets USP

8. SUPPLEMENT(s) PROVIDE(s) FOR: N/A
9. AMENDMENTS AND OTHER DATES:
FDA: 3/27/96 NA letter issued.

Firm:
8/8/95 Date of application
4/4/96 Correspondence
7/2/96 Response to NA letter dated 3/27/96.

10. PHARMACOLOGICAL CATEGORY
11. Rx or OTC Rx 12. RELATED IND/NDA/DMF(s) See sec. 37
13. DOSAGE FORM oral ER tablet 14. POTENCY **20mEq (1500mg)**
15. CHEMICAL NAME AND STRUCTURE As per USAN
16. RECORDS AND REPORTS N/A

18. CONCLUSIONS AND RECOMMENDATIONS
Tentative approval. EER acceptabe as of 12/5/96

19. REVIEWER: J.Fan DATE COMPLETED: 11/8/96

cc: ANDA 74-726
ANDA 74-726/Division File
Field Copy
Endorsements:
HFD-623/J.Fan/11-12-96 /S/ 12/16/96 /S/ 12/18/96.
HFD-623/V.Sayeed, Ph.D./11-13-96

F/T by: MM December 9, 1996
Approval Letter

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Chem #2

1. CHEMISTRY REVIEW NO. 3 2. ANDA # 74-726

3. NAME AND ADDRESS OF APPLICANT
Upsher-Smith Laboratories, Inc.
Attention: Mark S. Robbins, Ph.D.
14905 23rd Avenue North
Minneapolis, MN 55447

4. BASIS OF SUBMISSION **Paragraph IV** certification
Key Pharmaceutical's K-DUR® pat. #4863743, exp. Sept. 5, 2006.

Note: In a correspondence dated 2/13/98 firm provided a "Stipulation of Dismissal Without Prejudice" stating the court settlement regarding the patent litigation involving the referenced drug product between Key Pharamaceutical and the ANDA holder.

5. SUPPLEMENT(s) N/A
6. PROPRIETARY NAME Klor-Con® M20
7. NONPROPRIETARY NAME
Potassium Chloride Extended-release Tablets USP

8. SUPPLEMENT(s) PROVIDE(s) FOR: N/A
9. AMENDMENTS AND OTHER DATES:
FDA: 3/27/96 NA letter issued.
9/6/96 Bio letter issued.
3/3/97 Bio letter issued.
3/6/97 TA letter issued.
6/18/98 Bio letter issued.

Firm:
8/8/95 Date of application
4/4/96 Correspondence
7/2/96 Response to NA letter dated 3/27/96.
2/12/97 New corr (Bio)
3/14/97 New corr (Bio)
3/24/97 New corr (Bio)
11/7/97 New corr (Bio)
2/13/98 New corr (Notification of Stipulation of Dismissal)
8/20/98 Amendment (This review)
9/2/98 Amendment (This review)
9/24/98 Tel.amendment (This review)

10. PHARMACOLOGICAL CATEGORY
11. Rx or OTC Rx 12. RELATED IND/NDA/DMF(s) See sec. 37
13. DOSAGE FORM oral ER tablet 14. POTENCY **20mEq (1500mg)**
18. CONCLUSIONS AND RECOMMENDATIONS
Approval pending EER update.
19. REVIEWER: J.Fan DATE COMPLETED: 10/8/98

cc: ANDA 74-726
ANDA 74-726/Division File
Field Copy
Endorsements:
HFD-623/J.Fan/10-8-98 /S/ 10/20/98 /S/ 10/23/98
HFD-623/V.Sayeed, Ph.D./10-16/98
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F/T by: bc/10-20-98

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Chem #3