CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER: 83-009

CHEMISTRY REVIEW(S)

PUBLIC HEALTH SERVICE
FOOD AND DRUG ADMINISTRATION

Date: April 7, 1971

File 183-009

Refer to Attn of: (BD-420)

APR 12 1971

Subject: Dissolution Rate Data - Prednisone Tablets, NDA 80-246

To: Roger W. Barnes
Clinical Research Branch (BD-222)

THROUGH: Daniel Banes, Ph.D., Director, OPRT

Your memorandum deals with the adequacy of the USP XVIII Tablet dissolution test as an indication of generic equivalency.

The USP XVIII monograph for prednisone tablets includes a dissolution test which was applied to the subject sample. The monograph describes the test procedure, and sets a requirement that 60% of the labeled amount of $C_{21}H_{26}O_5$ dissolve in not more than 20 minutes.

In response to your specific questions;

2 a. In the simple case presented here, where a single datum will denote either compliance or non-compliance, I do not believe that supporting documentation would be essential to the evaluation of the report.

b. The methodology as presented in the USP is adequately described and does not require further elaboration.

c. The USP requirement of the single point constitutes the Official standard for this product. If dissolution rate is to be accepted in lieu of biologic availability, I believe that it is this standard which must be adhered to.

d. In a Quality Assurance study in FDA laboratories we have shown that there is definite question as to the reliability of the test procedure when applied to samples close to the borderline of compliance with the requirements of the monograph. Where compliance is readily achieved, however, as is the case with the sample which you report in your memorandum, no exceptions were recorded in the study.

e. As in question (c), the tests should adhere to the requirements of the monograph.

3. Since the legal requirements as stated in the USP are so explicitly defined, it is my opinion that conformance with these specifications must be accepted ipso facto as conformance with the requirements of an ANDA, without the need for comparison with a "reference product."

The data presented describe the behavior of only the lot tested. The question as to whether more than a single lot should be tested applies equally to any test applied to any product.

/S/

Joseph Levine
Director
Division of Drug Chemistry
Office of Pharmaceutical Research
and Testing
Bureau of Drugs

APPLICATION NEW DRUG APPLICATION OR SUPPLEMENT	Federal Register Statement Date	FDA Number 83-009 NDA Number 20-333

Name and Address of Applicant (City and State) rowell laboratoires, inc. baudette, mn 56623	Original Amendment Resubmission Correspondence Report Other
Purpose of Amendment/Supplement fpl	Date(s) of Submission(s) 12/6/73

Pharmacological Category	Name of Drug	How Dispensed
glucocorticoid	orasone (prednisone)	Rx [x] OTC [ ]
Dosage Form(s) tablet	Potency (ies) 1, 5, 10 & 20 mg	
Environmental Impact Analysis Report na	Samples na	Related IND/NDA/NDP(s)

Labeling

as per HO (jabcsanyi)

Biologic Availability

deferred, as per bio committee
6/14+ 6/28/72

Establishment Inspection

in compliance, as per bd-340 memo of 11/14/73

Components, Composition, Manufacturing and Controls

satisfactory.

Labeling

request: revised labeling, as per HO
stability statement

Conclusion

approved

Signature

Date

/s/ 1/24/74

Name and Address of Applicant (City and State) Rowell Laboratories, Inc. Baudette, Minn 56623	83-009 Original 4/14, 72 Amendment Supplement Other
Name of Drug: Orasone	Nonproprietary Name: prednisone
Purpose of Supplement	DATE(s) of Submission(s)
Pharmacological Category: glucocorticoid	How Dispensed: ☒ Rx ☐ OTC
Dosage Form(s): tablet	Potency(ies): 1mg 5 mg. 10 mg & 20 mg
	AF Number: 20-333 Related IND/NDA/MF

Satisfactory ☐ Labeling Date Due to be revised(jtbacsanyi)

Satisfactory ☐ Components, Composition, Manufacturing and Controls Date Due see below

Satisfactory ☐ Biologic Availability Date Due deferred (as per DCR memo on 80-246
Is data on current formulation? YES ☐ NO ☐

Satisfactory ☐ Probably or Possibly Effective Indications (if in labeling) Date data Due

Establishment Inspection requested: 7/13/72.	Recalls

Is relabeling of drug in commercial channels required? ☐ YES ☐ NO
If so, what level:

Remarks

request: revised labeling, as per m.o.'s review
1. rx statement
2. clarify procedures on prednisone & tablets
3. different tablet weights are listed on master formula card & work sheets-clarify
4. firm calls for 3 yr. stability--ask for data

NOTE: firm also provides for 10 & 20 mg tablets
tell firm that full NDA is needed

Conclusions

rev w/f

omillar 1/3/72

CHECKLIST'S REVIEW FOR NEW NEW DRUG APPLICATION OR SUPPLEMENT	Federal Register Statement Date	NDA Number 83-009

Name and Address of Applicant (City and State)		
rowell laboratoires, inc. baudette, mn 56623		Original Amendment Resubmission Correspondence Report Other
Purpose of Amendment/Supplement		Date(s) of Submission(s)
Pharmacological Category glucocorticoid	Name of Drug orasone (prednisone)	
Dosage Form(s) tablet	Potency (ies) 1, 5, 10 & 20 mg	How Dispensed Rx [X] OTC [ ]
Environmental Impact Analysis Report na	Samples na	Related IND/NDA/NF(s)

Labeling

as per MO (jabcsanyi)

Bioavailability

deferred, as per bio committee
6/14+ 6/28/72

Establishment Inspection

requested, as per bd-340 twx of 11/8/73

Components, Composition, Manufacturing and Controls

satisfactory; altho stability statement is needed

Remarks

request: revised labeling, as per MO
stability statement

Conclusion

rev w/f

/S/ 1-/-73

Author Date

Rowell Laboratories, Inc.
Baudette, Minn 56623

83-009

Original 4/14/72
Amendment
Supplement
Other

Name of Drug	Nonproprietary Name
Orasone	prednisone

DATE(s) of Submission
9/14/72+ 11/21/72+11/20

Purpose of Supplement

Pharmacological Category	How Dispensed	AF Number
glucocorticoid	☒ Rx ☐ OTC	20-333
Dosage Form(s)	**Potency(ies)**	**Related IND/NDA/NF**
tablet	1mg 5 mg. 10 mg & 20 mg	

Satisfactory ☐ Labeling Date Due _____ to be revised(jtbacsanyi)

Satisfactory ☐ Components, Composition, Manufacturing and Controls Date Due _____ see below

Satisfactory ☐ Biologic Availability Date Due _____ deferred (as per DCR memo on 80-246
Is data on current formulation? YES ☐ NO ☐

Satisfactory ☐ Probably or Possibly Effective Indications (if in labeling)
Date data Due _____

Establishment Inspection	Recalls
in compliance: TMX 7/26/72	

Is relabeling of drug in commercial channels required? ☐ YES ☐ NO
If so, what level:

Remarks

request - 1. revised labeling, as per M.O.'s review

2. stability data to support 3 yr. expiration date

Conclusions

rev w/f

/S/ 12/73
qmillar

Name and Address of Applicant (City and State)

Rovell Laboratories, Inc.
Baudette, Minn 56623

83-009

Original 4/14
Amendment
Supplement
Other

Trade Name of Drug	Nonproprietary Name
Orasone	prednisone

DATE(s) of Submission
9/14/72+ 11/21/72+11/[illegible]
3/15/73

Purpose of Supplement

Pharmacological Category	How Dispensed	AF Number
glucocorticoid	☒ Rx ☐ OTC	20-333

Dosage Form(s)	Potency(ies)	Related IND/NDA/MF
tablet	1mg 5 mg. 10 mg & 20 mg	

Satisfactory ☐ Labeling
Date Due ____ to be revised(jtbacsanyi)

Satisfactory ☐ Components, Composition, Manufacturing and Controls
Date Due ____ see below

Satisfactory ☐ Biologic Availability
Date Due ____ deferred
Is data on current formulation? YES ☐ NO ☐ (as per DCR memo on 80-246

Satisfactory ☐ Probably or Possibly Effective Indications (if in labeling)
Date data Due ____

Establishment Inspection	Recalls
in compliance: TMX 7/26/72	

Is relabeling of drug in commercial channels required? ☐ YES ☐ NO
If so, what level:

Remarks

tell firm that 10 & 20 mgs are no-go as abbreviated

Conclusions ack

/S/ [illegible] 5/11/73

REVIEWER: SIGNATURE: DATE:

Name and Address of Applicant (City and State)		83-009
Rowell Laboratories, Inc. Baudette, Minn 56623		Original 4/14, 72 Amendment Supplement Other
Name of Drug: Orasone	Nonproprietary Name: prednisone	DATE(s) of Submission(s): 9/14/72
Purpose of Supplement		
Pharmacological Category: glucocorticoid	How Dispensed: ☒ Rx ☐ OTC	AF Number: 20-333
Dosage Form(s): tablet	Potency(ies): 1mg 5 mg. 10 mg & 20 mg	Related IND/NDA/MF

Satisfactory ☐ Labeling Date Due _____ to be revised(jtbacsanyi)

Satisfactory ☐ Components, Composition, Manufacturing and Controls Date Due _____ see below

Satisfactory ☐ Biologic Availability Date Due _____ deferred (as per DCR memo on 80-246

Is data on current formulation? YES ☐ NO ☐

Satisfactory ☐ Probably or Possibly Effective Indications (if in labeling) Date data Due _____

Establishment Inspection	Recalls
requested: 7/13/72.	

Is relabeling of drug in commercial channels required? ☐ YES ☒ NO
If so, what level:

Remarks

request: 1. revised labeling, as per M.O.'s review
2. deletion of information pertaining to 10 & 20 mg.
3. procedures for avicel
4. stability data: note: firm maintains that its data is adeqaute, altho a formulation & mfg change has been made (including the use of additional XR excipie

Conclusions

rev w/f

/S/
gmillar