

D.F.
OCT 15 1998

NDA 16-793/S-059

Pharmacia & Upjohn Company
7000 Portage Road
Kalamazoo, Michigan 49001

Attention: Rebecca K. Tong, M.S.
Regulatory Manager, U.S. Regulatory Affairs

Dear Ms. Tong:

Please refer to your supplemental new drug application dated March 5, 1998, received March 6, 1998, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for CYTOSAR-U (sterile cytarabine, USP) sterile powder.

The User Fee goal date for this application is September 6, 1998.

The supplemental application was submitted as a "Special Supplement-Changes Being Effected" under 21 CFR 314.70(c)(2)(i) and provides for a revised package insert with the following changes:

1. **PRECAUTIONS:** (a) A third reference (Smith et al, 1997; reference 49) was added to support the precautionary statement regarding CNS toxicity in patients with renal impairment. (b) A statement about the possibility of acute pancreatitis being schedule dependent was added (McBride et al, 1996; reference 50).
2. **ADVERSE REACTIONS:** Pancreatitis is added to the list of less frequent adverse reactions.
3. **REFERENCES:** The references described above [49 and 50] were added to the list. The references supporting these changes are provided in Attachment C.

We have completed the review of this supplemental application and it is approved. However, the following changes should be completed at the next printing or within 90 days, whichever comes first.

1. Please modify the trade dress so that For Intravenous, Intrathecal and Subcutaneous Use Only is directly below established name and not separated by the bar.

2. REFERENCES section should be revised to delete all references except for the references that refer to safe handling procedures (see below for updated listings). The superscripts in the text should also be revised to reflect these changes.

REFERENCES

1. Recommendations for the Safe Handling of Parenteral Antineoplastic Drugs, NIH Publication No. 83-2621. For sale by the Superintendent of Documents, U.S. Government Printing office, Washington, DC 20402.
2. AMA Council Report, Guidelines for Handling Parenteral Antineoplastics. JAMA, 1985; 253(11):1590-1592.
3. National Study Commission on Cytotoxic Exposure - Recommendations for Handling Cytotoxic Agents. Available from Louis P. Jeffrey, ScD., Chairman, National Study Commission on Cytotoxic Exposure, Massachusetts College of Pharmacy and Allied Health Sciences, 179 Longwood Avenue, Boston, Massachusetts 02115.
4. Clinical Oncological Society of Australia, Guidelines and Recommendations for Safe Handling of Antineoplastic Agents. Med J Australia, 1983; 1:426-428.
5. Jones RB, et al: Safe Handling Of Chemotherapeutic Agents: A Report from the Mount Sinai Medical Center. CA - A Cancer Journal for Clinicians, 1983; (Sept/Oct) 258-263.
6. American Society of Hospital Pharmacists Technical Assistance Bulletin on Handling Cytotoxic and Hazardous Drugs. Am J. Hosp Pharm, 1990; 47:1033-1049.
7. Controlling Occupational Exposure to Hazardous Drugs. (OSHA Work-Practice Guidelines), Am J Health-Syst Pharm, 1996; 53:1669-1685.

3. Storage Conditions on the carton labels for drug product should be revised to read:

Store at 25°C (77°F); excursions permitted to 15°-30°C (59°-86°F)
[See USP Controlled Room Temperature]

4. Storage statement in the HOW SUPPLIED section in the pi should be revised to read:

Store at 25°C (77°F); excursions permitted to 15°-30°C (59°-86°F)
[See USP Controlled Room Temperature]

5. The statement of "Caution: Federal law prohibits....." should be revised to read:
"Rx only" or "R only" symbols on drug product labels.
6. Under *Cell Culture Studies*: delete second paragraph regarding antiviral effects.
7. Delete entire *Animal Studies* section.
8. Under *Use in Pregnancy*, replace "(See ANIMAL TOXICOLOGY)" with "Cytarabine causes abnormal cerebellar development in the neonatal hamster and is teratogenic to the rat fetus." Delete fourth sentence- "If CYTOSAR-U is used.....".
9. Delete entire *Animal Toxicology* section (at end).
10. Under PRECAUTIONS Section, delete the proposed sentence "There is evidence that this may be schedule dependent."
11. Under PRECAUTIONS Section, replace the sentence: "Acute pancreatitis has been reported" with the following sentence: "Acute pancreatitis has been reported to occur in a patient receiving Cytosar-U by continuous infusion and in patients being treated with Cytosar-U who have had prior treatment with L-asparaginase."


Should a letter communicating important information about this drug product (i.e., a Dear Doctor letter) be issued to physicians and others responsible for patient care, we request that you submit a copy of the letter to this NDA and a copy to the following address:

MEDWATCH, HF-2
FDA
5600 Fishers Lane
Rockville, MD 20852-9787

We remind you that you must comply with the requirements for an approved NDA set forth under 21 CFR 314.80 and 314.81.

If you have any questions, please contact Patrick Guinn, Project Manager, at (301) 827-1537.

Sincerely yours,


Robert L. Justice, M.D.
Acting Director
Division of Oncology Drug Products
Office of Drug Evaluation I
Center for Drug Evaluation and Research

Enclosure

cc:

Original NDA 16-793
HFD-150/Div. files
HFD-150/CSO/P.Guinn
HFD-150/RJustice
HFD-150/GWilliams
HFD-150/SHirschfeld
HFD-150/LZhou
HFD-150/CLiang
HFD-150/PAndrews
HFD-150/DYLee-Ham
HFD-150/DPease
DISTRICT OFFICE
HF-2/Medwatch (with labeling)
HFD-92/DDM-DIAB (with labeling)
HFD-40/DDMAC (with labeling)
HFD-613/OGD (with labeling)
HFD-735/DPE (with labeling) - for all NDAs and supplements for adverse reaction changes.
HFI-20/Press Office (with labeling)

Drafted by: PGuinn/March 19, 1998

Initialed by: DPease/3-24-98
SHirschfeld/4-3-98
GWilliams/4-10-98
CLiang/4-10-98
LZhou/4-10-98
DYLee-Ham/4-16-98
PAndrews/5-7-98

Draft # 2 by: PGuinn/5-22-98

Initialed by: DPease/5-27-98 - *Delon 7/24/98*
RJustice/6-11-98

F/T by: PGuinn/7-22-98

F/T init by: DPease/

APPROVAL (AP)

Cytosar-U®
sterile cytarabine, USP



Pharmacia
& Upjohn

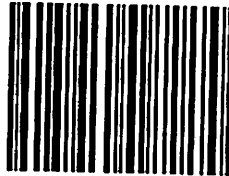
For Intravenous, Intrathecal and Subcutaneous Use Only

APPROVED

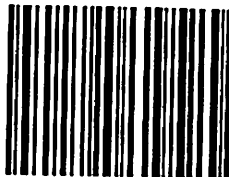
OCT 15 1998

Cytosar-U
sterile cytarabine, USP

0810126322



Cytosar-U
sterile cytarabine, USP



0810126322

WARNING

Only physicians experienced in cancer chemotherapy should use CYTOSAR-U Sterile Powder. For induction therapy patients should be treated in a facility with laboratory and supportive resources sufficient to monitor drug tolerance and protect and maintain a patient compromised by drug toxicity. The main toxic effect of CYTOSAR-U is bone marrow suppression with leukopenia, thrombocytopenia and anemia. Less serious toxicity includes nausea, vomiting, diarrhea and abdominal pain, oral ulceration, and hepatic dysfunction.

The physician must judge possible benefit to the patient against known toxic effects of this drug in considering the advisability of therapy with CYTOSAR-U. Before making this judgment or beginning treatment, the physician should be familiar with the following text.

DESCRIPTION

CYTOSAR-U (cytarabine) Sterile Powder, commonly known as ara-C, an antineoplastic, is a sterile lyophilized material for reconstitution and intravenous, intrathecal or subcutaneous administration. It is available in multi-dose vials containing 100 mg, 500 mg, 1 g or 2 g sterile cytarabine. The pH of CYTOSAR-U was adjusted, when necessary, with hydrochloric acid and/or sodium hydroxide.

Cytarabine is chemically 4-amino-1-β-D-arabinofuranosyl-2 (1H)-pyrimidinone. The structural formula is:
Cytarabine is an odorless, white to off-white, crystalline powder which is freely soluble in water and slightly soluble in alcohol and in chloroform.

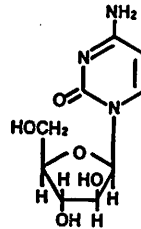
PHARMACOLOGY
Cell Culture Studies

Cytarabine is cytotoxic to a wide variety of proliferating mammalian cells in culture. It exhibits cell phase specificity, primarily killing cells undergoing DNA synthesis (S-phase) and under certain conditions blocking the progression of cells from the G₁ phase to the S-phase. Although the mechanism of action is not completely understood, it appears that cytarabine acts through the inhibition of DNA polymerase. A limited, but significant, incorporation of cytarabine into both DNA and RNA has also been reported. Extensive chromosomal damage, including chromatoid breaks, have been produced by cytarabine and malignant transformation of rodent cells in culture has been reported. Deoxycytidine prevents or delays (but does not reverse) the cytotoxic activity.

Cell culture studies have shown an antiviral effect.¹ However, efficacy against herpes zoster or smallpox could not be demonstrated in controlled clinical trials.²⁻⁴

Cellular Resistance and Sensitivity

Cytarabine is metabolized by deoxycytidine kinase and other nucleotide kinases to the nucleotide triphosphate, an effective inhibitor of DNA polymerase; it is inactivated by a pyrimidine nucleoside deaminase, which converts it to the nontoxic uracil derivative. It appears that the balance of kinase and deaminase levels may be an important factor in determining sensitivity or resistance of the cell to cytarabine.



Animal Studies

In experimental studies with mouse tumors, cytarabine was most effective in those tumors with a high growth fraction. The effect was dependent on the treatment schedule; optimal results were achieved when the schedule (multiple closely spaced doses or constant infusion) ensured contact of the drug with the tumor cells when the maximum number of cells were in the susceptible S-phase. The best results were obtained when courses of therapy were separated by intervals sufficient to permit adequate host recovery.

Human Pharmacology

Cytarabine is rapidly metabolized and is not effective orally; less than 20 percent of the orally administered dose is absorbed from the gastrointestinal tract.

Following rapid intravenous injection of cytarabine labeled with tritium, the disappearance from plasma is biphasic. There is an initial distributive phase with a half-life of about 10 minutes, followed by a second elimination phase with a half-life of about 1 to 3 hours. After the distributive phase, more than 80 percent of plasma radioactivity can be accounted for by the inactive metabolite 1- β -D-arabinofuranosyluracil (ara-U). Within 24 hours about 80 percent of the administered radioactivity can be recovered in the urine, approximately 90 percent of which is excreted as ara-U.

Relatively constant plasma levels can be achieved by continuous intravenous infusion.

After subcutaneous or intramuscular administration of cytarabine labeled with tritium, peak-plasma levels of radioactivity are achieved about 20 to 60 minutes after injection and are considerably lower than those after intravenous administration.

Cerebrospinal fluid levels of cytarabine are low in comparison to plasma levels after single intravenous injection. However, in one patient in whom cerebrospinal levels were examined after 2 hours of constant intravenous infusion, levels approached 40 percent of the steady state plasma level. With intrathecal administration, levels of cytarabine in the cerebrospinal fluid declined with a first order half-life of about 2 hours. Because cerebrospinal fluid levels of deaminase are low, little conversion to ara-U was observed.

Immunosuppressive Action

CYTOSAR-U Sterile Powder is capable of obliterating immune responses in man during administration with little or no accompanying toxicity.³⁻⁶ Suppression of antibody responses to E-coli-VI antigen and tetanus toxoid have been demonstrated. This suppression was obtained during both primary and secondary antibody responses.

CYTOSAR-U also suppressed the development of cell-mediated immune responses such as delayed hypersensitivity skin reaction to dinitrochlorobenzene. However, it had no effect on already established delayed hypersensitivity reactions.

Following 5-day courses of intensive therapy with CYTOSAR-U the immune response was suppressed, as indicated by the following parameters: macrophage ingress into skin windows; circulating antibody response following primary antigenic stimulation; lymphocyte blastogenesis with phytohemagglutinin. A few days after termination of therapy there was a rapid return to normal.⁷

INDICATIONS AND USAGE

CYTOSAR-U in combination with other approved anticancer drugs is indicated for remission induction in acute non-lymphocytic leukemia of adults and pediatric patients. It has also been found useful in the treatment of acute lymphocytic leukemia and the blast phase of chronic myelocytic leukemia. Intrathecal administration of CYTOSAR-U is indicated in the prophylaxis and treatment of meningeal leukemia.

CONTRAINDICATIONS

CYTOSAR-U Sterile Powder is contraindicated in those patients who are hypersensitive to the drug.

WARNINGS (See boxed WARNING)

Cytarabine is a potent bone marrow suppressant. Therapy should be started cautiously in patients with pre-existing drug-induced bone marrow suppression. Patients receiving this drug must be under close medical supervision and, during induction therapy, should have leukocyte and platelet counts performed daily. Bone marrow examinations should be performed frequently after blasts have disappeared from the peripheral blood. Facilities should be available for management of complications, possibly fatal, of bone marrow suppression (infection resulting from granulocytopenia and other impaired body defenses, and hemorrhage secondary to thrombocytopenia). One case of anaphylaxis that resulted in acute cardiopulmonary arrest and required resuscitation has been reported. This occurred immediately after the intravenous administration of CYTOSAR-U Sterile Powder.

Severe and at times fatal CNS, GI and pulmonary toxicity (different from that seen with conventional therapy regimens of CYTOSAR-U) has been reported following some experimental dose schedules for CYTOSAR-U.⁸⁻¹¹ These reactions include reversible corneal toxicity, and hemorrhagic conjunctivitis, which may be prevented or diminished by prophylaxis with a local corticosteroid eye drop; cerebral and cerebellar dysfunction, including personality changes, somnolence and coma, usually reversible; severe gastrointestinal ulceration, including pneumatosis cystoides intestinalis leading to peritonitis; sepsis and liver abscess; pulmonary edema, liver damage with increased hyperbilirubinemia; bowel necrosis; and necrotizing colitis. Rarely, severe skin rash, leading to desquamation has been reported. Complete alopecia is more commonly seen with experimental high dose therapy than with standard treatment programs using CYTOSAR-U. If experimental high dose therapy is used, do not use a diluent containing benzyl alcohol.

Cases of cardiomyopathy with subsequent death have been reported following experimental high dose therapy with cytarabine in combination with cyclophosphamide when used for bone marrow transplant preparation.¹²

A syndrome of sudden respiratory distress, rapidly progressing to pulmonary edema and radiographically pronounced cardiomegaly has been reported following experimental high dose therapy with cytarabine used for the treatment of relapsed leukemia from one institution in 16/72 patients. The outcome of this syndrome can be fatal.¹³

Benzyl alcohol is contained in the diluent for this product. Benzyl alcohol has been reported to be associated with a fatal "Gasping Syndrome" in premature infants.

Two patients with childhood acute myelogenous leukemia who received intrathecal and intravenous CYTOSAR-U at conventional doses (in addition to a number of other concomitantly administered drugs) developed delayed progressive ascending paralysis resulting in death in one of the two patients.¹⁴

Use in Pregnancy (Category D)

CYTOSAR-U can cause fetal harm when administered to a pregnant woman. (See ANIMAL TOXICOLOGY). There are no adequate and well-controlled studies in pregnant women. If CYTOSAR-U is used during pregnancy, or if the patient becomes pregnant while taking CYTOSAR-U, the patient should be apprised of the potential hazard to the fetus. Women of childbearing potential should be advised to avoid becoming pregnant.

A review of the literature has shown 32 reported cases where CYTOSAR-U was given during pregnancy, either alone or in combination with other cytotoxic agents:

Eighteen normal infants were delivered. Four of these had first trimester exposure. Five infants were premature or of low birth weight. Twelve of the 18 normal infants were followed up at ages ranging from six weeks to seven years, and showed no abnormalities. One apparently normal infant died at 90 days of gastroenteritis.

Two cases of congenital abnormalities have been reported, one with upper and lower distal limb defects,¹⁶ and the other with extremity and ear deformities.¹⁷ Both of these cases had first trimester exposure.

There were seven infants with various problems in the neonatal period, including pancytopenia; transient depression of WBC, hematocrit or platelets; electrolyte abnormalities; transient eosinophilia; and one case of increased IgM levels and hyperpyrexia possibly due to sepsis. Six of the seven infants were also premature. The child with pancytopenia died at 21 days of sepsis.

Therapeutic abortions were done in five cases. Four fetuses were grossly normal, but one had an enlarged spleen and another showed Trisomy C chromosome abnormality in the chorionic tissue.

Because of the potential for abnormalities with cytotoxic therapy, particularly during the first trimester, a patient who is or who may become pregnant while on CYTOSAR-U should be apprised of the potential risk to the fetus and the advisability of pregnancy continuation. There is a definite, but considerably reduced risk if therapy is initiated during the second or third trimester. Although normal infants have been delivered to patients treated in all three trimesters of pregnancy, follow-up of such infants would be advisable.

1. General Precautions

Patients receiving CYTOSAR-U Sterile Powder must be monitored closely. Frequent platelet and leukocyte counts and bone marrow examinations are mandatory. Consider suspension of modifying therapy when drug-induced marrow depression has resulted in a platelet count under 50,000 or a polymorphonuclear granulocyte count under 1000/mm³. Counts of formed elements in the peripheral blood may continue to fall after the drug is stopped and reach lowest values after drug-free intervals of 12 to 24 days. When indicated, restart therapy when definite signs of marrow recovery appear (on successive bone marrow studies). Patients whose drug is withheld until "normal" peripheral blood values are attained may escape from control.

When large intravenous doses are given quickly, patients are frequently nauseated and may vomit for several hours postinjection. This problem tends to be less severe when the drug is infused.

The human liver apparently detoxifies a substantial fraction of an administered dose. In particular, patients with renal or hepatic function impairment may have a higher likelihood of CNS toxicity after high-dose CYTOSAR-U treatment.^{46,47,49} Use the drug with caution and possibly at reduced dose in patients whose liver or kidney function is poor.

Periodic checks of bone marrow, liver and kidney functions should be performed in patients receiving CYTOSAR-U. Like other cytotoxic drugs, CYTOSAR-U may induce hyperuricemia secondary to rapid lysis of neoplastic cells. The clinician should monitor the patient's blood uric acid level and be prepared to use such supportive and pharmacologic measures as might be necessary to control this problem.

Acute pancreatitis has been reported to occur in patients being treated with CYTOSAR-U who have had prior treatment with L-asparaginase.¹⁵ There is evidence that this may be schedule dependent.⁵⁰

2. Information for patient

Not applicable

3. Laboratory tests

See General Precautions

4. Drug Interactions

Reversible decreases in steady-state plasma digoxin concentrations and renal glycoside excretion were observed in patients receiving beta-acetyldigoxin and chemotherapy regimens containing cyclophosphamide, vincristine and prednisone with or without CYTOSAR-U or procarbazine.³⁹ Steady-state plasma digoxin concentrations did not appear to change. Therefore, monitoring of plasma digoxin levels may be indicated in patients receiving similar combination chemotherapy regimens. The utilization of digoxin for such patients may be considered as an alternative.

An *in vitro* interaction study between gentamicin and cytarabine showed a cytarabine related antagonism for the susceptibility of *K. pneumoniae* strains. This study suggests that in patients on cytarabine being treated with gentamicin for a *K. pneumoniae* infection, the lack of a prompt therapeutic response may indicate the need for reevaluation of antibacterial therapy.⁴⁰

Clinical evidence in one patient showed possible inhibition of fluorocytosine efficacy during therapy with CYTOSAR-U.⁴¹ This may be due to potential competitive inhibition of its uptake.⁴²

5. Carcinogenesis, mutagenesis, Impairment of fertility

Extensive chromosomal damage, including chromatoid breaks have been produced by cytarabine and malignant transformation of rodent cells in culture has been reported.

6. Pregnancy

Pregnancy Category D. See WARNINGS.

7. Labor and delivery

Not applicable

8. Nursing mothers

It is not known whether this drug is excreted in human milk. Because many drugs are excreted in human milk and because of the potential for serious adverse reactions in nursing infants from cytarabine, a decision should be made whether to discontinue nursing or to discontinue the drug, taking into account the importance of the drug to the mother.

9. Pediatric use

See INDICATIONS AND USAGE

ADVERSE REACTIONS

Expected Reactions

Because cytarabine is a bone marrow suppressant, anemia, leukopenia, thrombocytopenia, megaloblastosis and reduced reticulocytes can be expected as a result of administration with CYTOSAR-U Sterile Powder. The severity of these reactions are dose and schedule dependent.¹⁸ Cellular changes in the morphology of bone marrow and peripheral smears can be expected.¹⁹

Following 5-day constant infusions or acute injections of 50 mg/m² to 600 mg/m², white cell depression follows a biphasic course. Regardless of initial count, dosage level, or schedule, there is an initial fall starting the first 24 hours with a nadir at days 7-9. This is followed by a brief rise which peaks around the twelfth day. A second and deeper fall reaches nadir at days 15-24. Then there is rapid rise to above baseline in the next 10 days. Platelet depression is noticeable at 5 days with a peak depression occurring between days 12-15. Thereupon, a rapid rise to above baseline occurs in the next 10 days.²⁰

Infectious Complications

Infection: Viral, bacterial, fungal, parasitic, or saprophytic infections, in any location in the body may be associated with the use of CYTOSAR-U alone or in combination with other immunosuppressive agents following immunosuppressant doses that affect cellular or humoral immunity. These infections may be mild, but can be severe and at times fatal.

The Cytarabine (Ara-C) Syndrome

A cytarabine syndrome has been described by Castleberry.²¹ It is characterized by fever, myalgia, bone pain, occasionally chest pain, maculopapular rash, conjunctivitis and malaise. It usually occurs 6-12 hours following drug administration. Corticosteroids have been shown to be beneficial in treating or preventing this syndrome. If the symptoms of the syndrome are deemed treatable, corticosteroids should be contemplated as well as continuation of therapy with CYTOSAR-U.

Most Frequent Adverse Reactions

| | | |
|----------|----------------------------|----------------------|
| anorexia | oral and anal inflammation | rash |
| nausea | or ulceration | thrombophlebitis |
| vomiting | hepatic dysfunction | bleeding (all sites) |
| diarrhea | fever | |

Nausea and vomiting are most frequent following rapid intravenous injection.

Less Frequent Adverse Reactions

| | | |
|------------------------------|-----------------------|--------------------------------------|
| sepsis | sore throat | conjunctivitis (may occur with rash) |
| pneumonia | esophageal ulceration | dizziness |
| cellulitis at injection site | esophagitis | alopecia |
| skin ulceration | chest pain | anaphylaxis (See WARNINGS) |
| urinary retention | pericarditis | allergic edema |
| renal dysfunction | bowel necrosis | pruritus |
| neuritis | abdominal pain | shortness of breath |
| neural toxicity | pancreatitis | urticaria |
| | freckling | headache |
| | jaundice | |

Experimental Doses

Severe and at times fatal CNS, GI and pulmonary toxicity (different from that seen with conventional therapy regimens of CYTOSAR-U) has been reported following some experimental dose schedules of CYTOSAR-U.⁸⁻¹¹ These reac-

Sterile Powder

Cytosar-U

brand of sterile cytarabine

tions include reversible corneal toxicity and hemorrhagic conjunctivitis, which may be prevented or diminished by prophylaxis with a local corticosteroid eye drop; cerebral and cerebellar dysfunction, including personality changes, somnolence and coma, usually reversible; severe gastrointestinal ulceration, including pneumatosis cystoides intestinalis leading to peritonitis; sepsis and liver abscess; pulmonary edema, liver damage with increased hyperbilirubinemia; bowel necrosis; and necrotizing colitis. Rarely, severe skin rash, leading to desquamation has been reported. Complete alopecia is more commonly seen with experimental high dose therapy than with standard treatment programs using CYTOSAR-U. If experimental high dose therapy is used, do not use a diluent containing benzyl alcohol.

Cases of cardiomyopathy with subsequent death have been reported following experimental high dose therapy with cytarabine in combination with cyclophosphamide when used for bone marrow transplant preparation.¹² This cardiac toxicity may be schedule dependent.⁴⁵

A syndrome of sudden respiratory distress, rapidly progressing to pulmonary edema and radiographically pronounced cardiomegaly has been reported following experimental high dose therapy with cytarabine used for the treatment of relapsed leukemia from one institution in 16/72 patients. The outcome of this syndrome can be fatal.¹³

(continued below)

Two patients with adult acute non-lymphocytic leukemia developed peripheral motor and sensory neuropathies after consolidation with high-dose CYTOSAR-U, daunorubicin, and asparaginase. Patients treated with high-dose CYTOSAR-U should be observed for neuropathy since dose schedule alterations may be needed to avoid irreversible neurologic disorders.²²

Ten patients treated with experimental intermediate doses of CYTOSAR-U (1 g/m²) with and without other chemotherapeutic agents (meta-AMSA, daunorubicin, etoposide) at various dose regimens developed a diffuse interstitial pneumonitis without clear cause that may have been related to the CYTOSAR-U.⁴³

Two cases of pancreatitis have been reported following experimental doses of CYTOSAR-U and numerous other drugs. CYTOSAR-U could have been the causative agent.⁴⁴

OVERDOSAGE

There is no antidote for overdosage of CYTOSAR-U. Doses of 4.5 g/m² by intravenous infusion over 1 hour every 12 hours for 12 doses has caused an unacceptable increase in irreversible CNS toxicity and death.⁹

Single doses as high as 3 g/m² have been administered by rapid intravenous infusion without apparent toxicity.²³

DOSAGE AND ADMINISTRATION

CYTOSAR-U Sterile Powder is not active orally. The schedule and method of administration varies with the program of therapy to be used. CYTOSAR-U may be given by intravenous infusion or injection, subcutaneously, or intrathecally. Thrombophlebitis has occurred at the site of drug injection or infusion in some patients, and rarely patients have noted pain and inflammation at subcutaneous injection sites. In most instances, however, the drug has been well tolerated.

Patients can tolerate higher total doses when they receive the drug by rapid intravenous injection as compared with slow infusion. This phenomenon is related to the drug's rapid inactivation and brief exposure of susceptible normal and neoplastic cells to significant levels after rapid injection. Normal and neoplastic cells seem to respond in somewhat parallel fashion to these different modes of administration and no clear-cut clinical advantage has been demonstrated for either.

In the induction therapy of acute non-lymphocytic leukemia, the usual cytarabine dose in combination with other anti-cancer drugs is 100 mg/m²/day by continuous IV infusion (Days 1-7) or 100 mg/m² IV every 12 hours (Days 1-7).

The literature should be consulted for the current recommendations for use in acute lymphocytic leukemia.

Intrathecal Use in Meningeal Leukemia

CYTOSAR-U has been used intrathecally in acute leukemia in doses ranging from 5 mg/m² to 75 mg/m² of body surface area. The frequency of administration varied from once a day for 4 days to once every 4 days. The most frequently used dose was 30 mg/m² every 4 days until cerebrospinal fluid findings were normal, followed by one additional treatment.²⁴⁻²⁸ The dosage schedule is usually governed by the type and severity of central nervous system manifestations and the response to previous therapy.

If used intrathecally, do not use a diluent containing benzyl alcohol. Many clinicians reconstitute with autologous spinal fluid or preservative-free 0.9% Sodium Chloride, USP, for injection and use immediately.

CYTOSAR-U given intrathecally may cause systemic toxicity and careful monitoring of the hemopoietic system is indicated. Modification of other anti-leukemia therapy may be necessary. Major toxicity is rare. The most frequently reported reactions after intrathecal administration were nausea, vomiting and fever; these reactions are mild and self-limiting. Paraplegia has been reported.²⁹ Necrotizing leukoencephalopathy occurred in 5 children; these patients had also been treated with intrathecal methotrexate and hydrocortisone, as well as by central nervous system radiation.³⁰ Isolated neurotoxicity has been reported.³¹ Blindness occurred in two patients in remission whose treatment had consisted of combination systemic chemotherapy, prophylactic central nervous system radiation and intrathecal CYTOSAR-U.³²

When CYTOSAR-U is administered both intrathecally and intravenously within a few days, there is an increased risk of spinal cord toxicity, however, in serious life-threatening disease, concurrent use of intravenous and intrathecal CYTOSAR-U is left to the discretion of the treating physician.

Focal leukemic involvement of the central nervous system does not respond to intrathecal CYTOSAR-U and may better be treated with radiotherapy.

The 100 mg vial may be reconstituted with 5 mL of Bacteriostatic Water for Injection with Benzyl Alcohol 0.945% w/v added as preservative. The resulting solution contains 20 mg of cytarabine per mL. (Do not use Bacteriostatic Water for Injection with Benzyl Alcohol 0.945% w/v as a diluent for intrathecal use. See WARNINGS).

The 500 mg vial may be reconstituted with 10 mL Bacteriostatic Water for Injection with Benzyl Alcohol 0.945% w/v added as preservative. The resulting solution contains 50 mg of cytarabine per mL. (Do not use Bacteriostatic Water for Injection with Benzyl Alcohol 0.945% w/v as a diluent for intrathecal use. See WARNINGS).

The 1 gram vial may be reconstituted with 10 mL of Bacteriostatic Water for Injection with Benzyl Alcohol 0.945% w/v added as preservative. The resulting solution contains 100 mg of cytarabine per mL. (Do not use Bacteriostatic Water for Injection with Benzyl Alcohol 0.945% w/v as a diluent for intrathecal use. See WARNINGS).

The 2 gram vial may be reconstituted with 20 mL of Bacteriostatic Water for Injection with Benzyl Alcohol 0.945% w/v added as preservative. The resulting solution contains 100 mg of cytarabine per mL. (Do not use Bacteriostatic Water for Injection with Benzyl Alcohol 0.945% w/v as a diluent for intrathecal use. See WARNINGS).

If used intrathecally many clinicians reconstitute with preservative-free 0.9% Sodium Chloride for Injection and use immediately.

The pH of the reconstituted solutions is about 5. Solutions reconstituted with Bacteriostatic Water for Injection with Benzyl Alcohol 0.945% w/v may be stored at controlled room temperature, 20° to 25° C (68° to 77° F) for 48 hours. Discard any solutions in which a slight haze develops.

Solutions reconstituted without a preservative should be used immediately.

Chemical Stability of Infusion Solutions:

Chemical stability studies were performed by ultraviolet assay on CYTOSAR-U in infusion solutions. These studies showed that when reconstituted CYTOSAR-U was added to Water for Injection, 5% Dextrose in Water or Sodium Chloride Injection, 94 to 96 percent of the cytarabine was present after 192 hours storage at room temperature.

Parenteral drugs should be inspected visually for particulate matter and discoloration, prior to administration, whenever solution and container permit.

Procedures for proper handling and disposal of anticancer drugs should be considered. Several guidelines on this subject have been published.³³⁻³⁸ There is no general agreement that all of the procedures recommended in the guidelines are necessary or appropriate.

HOW SUPPLIED

CYTOSAR-U Sterile Powder (sterile cytarabine) is available in multi-dose vials of four sizes:

- 100 mg vial, NDC 0009-0373-01
- 500 mg vial, NDC 0009-0473-01
- 1 g vial, NDC 0009-3295-01
- 2 g vial, NDC 0009-3296-01

Store the product at controlled room temperature 20° to 25° C (68° to 77° F) [see USP].

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ANIMAL TOXICOLOGY

Toxicity of cytarabine in experimental animals, as well as activity, is markedly influenced by the schedule of administration. For example, in mice, the LD₁₀ for single intraperitoneal administration is greater than 6000 mg/m². However, when administered as 8 doses, each separated by 3 hours, the LD₁₀ is less than 750 mg/m² total dose. Similarly, although a total dose of 1920 mg/m² administered as 12 injections at 6-hour intervals was lethal to beagle dogs (severe bone marrow hypoplasia with evidence of liver and kidney damage), dogs receiving the same total dose administered in 8 injections (again at 6-hour intervals) over a 48-hour period survived with minimal signs of toxicity. The most consistent observation in surviving dogs was elevated transaminase levels. In all experimental species the primary limiting toxic effect is marrow suppression with leukopenia. In addition, cytarabine causes abnormal cerebellar development in the neonatal hamster and is teratogenic to the rat fetus.

Caution: Federal law prohibits dispensing without prescription.

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