

**CENTER FOR DRUG EVALUATION AND RESEARCH**

**APPROVAL PACKAGE FOR:**

**APPLICATION NUMBER**

**21-321**

**Correspondence**

Redacted 19

pages of trade

secret and/or

confidential

commercial

information



October 30, 2001

Raymond J. Lipicky, M.D.  
Food and Drug Administration  
Center for Drug Evaluation and Research  
Division of Cardio-Renal Drug Products  
Attention: Document Control Room, HFD-110  
1451 Rockville Pike  
Rockville, MD 20852



RE: NDA 21-321  
Extraneal™ (7.5% icodextrin) Peritoneal Dialysis Solution  
Minor Amendment - 12  
Proposed Draft Labeling

Dear Dr. Lipicky:

Baxter Healthcare Corporation acknowledges receipt of the Approvable Letter for NDA 21-321 by fax on October 22, 2001 and by mail on October 26, 2001. In response to this action letter and in accordance with 21 CFR 314.60, Baxter Healthcare Corporation is amending NDA 21-321 to include proposed draft labeling. This draft labeling is in response to the marked-up draft labeling included with the Approvable Letter.

Comments from the marked-up draft which were acceptable to Baxter or did not require or request sponsor input have been incorporated into the proposed labeling without highlighting. Those comments requesting sponsor input have been addressed as bolded, underlined text in the labeling and with a bolded reference or description in the right hand column. In addition, editorial/typographical comments have been identified in this same manner.

The amendment includes a version of the proposed label as described in the preceding paragraph, a version of text without sponsor comments, and electronic copies in pdf and Word.

Baxter Healthcare Corporation has accepted most of Dr. Temple's comments. There are two sections for which alternative proposals have been incorporated into the draft label:

1. The section "**Clinical Studies – Ultrafiltration, Urea and Creatinine Clearance, Negative Net Ultrafiltration**" (page 5-6) had been reorganized by Dr. Temple into CAPD data followed by APD data. The \_\_\_\_\_ which had been a separate paragraph at the end of the section, was removed during the reorganization of this section. Baxter has included this integral and critical UF data by CAPD and APD to follow with Dr. Temple's organization of this section.

2. In the section "INDICATIONS AND USAGE" the second paragraph had been removed. Baxter proposes modifying this section by \_\_\_\_\_  
\_\_\_\_\_ described in a key section of the package insert for prescribing physicians.

Baxter would appreciate a response to the proposed draft labeling at the Division's earliest convenience. If the proposed labeling is acceptable, Baxter will submit final printed labeling and will not require the meeting with Dr. Temple scheduled for November 9, 2001 from 2:00 - 3:30pm EST.

Please do not hesitate to contact me at **847-473-6361** if you have any questions or comments.

Sincerely yours,



Mary Kay Rybicki  
Associate Director, Regulatory Affairs

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
FOOD AND DRUG ADMINISTRATION

Form Approved: OMB No. 0910-0338  
Expiration Date: March 31, 2003  
See OMB Statement on page 2.

**APPLICATION TO MARKET A NEW DRUG, BIOLOGIC,  
OR AN ANTIBIOTIC DRUG FOR HUMAN USE**

(Title 21, Code of Federal Regulations, Parts 314 & 601)

FOR FDA USE ONLY

APPLICATION NUMBER

APPLICANT INFORMATION

NAME OF APPLICANT

**Baxter Healthcare Corporation**

DATE OF SUBMISSION

**October 30, 2001**

TELEPHONE NO. (Include Area Code)

**847-473-6361**

FACSIMILE (FAX) Number (Include Area Code)

**847-473-6952**

APPLICANT ADDRESS (Number, Street, City, State, Country, ZIP Code or Mail Code, and U.S. License number if previously issued):

**1620 Waukegan Road  
McGaw Park, IL 60085**

AUTHORIZED U.S. AGENT NAME & ADDRESS (Number, Street, City, State, ZIP Code, telephone & FAX number) IF APPLICABLE

PRODUCT DESCRIPTION

NEW DRUG OR ANTIBIOTIC APPLICATION NUMBER, OR BIOLOGICS LICENSE APPLICATION NUMBER (If previously issued) **NDA 21-321**

ESTABLISHED NAME (e.g., Proper name, USP/USAN name)

**icodextrin**

PROPRIETARY NAME (trade name) IF ANY

**Extraneal**

CHEMICAL/BIOCHEMICAL/BLOOD PRODUCT NAME (If any)

**alpha 1,4 polyglucopyranose**

CODE NAME (If any)

DOSAGE FORM:

**PD Solution**

STRENGTHS:

**7.5% w/v**

ROUTE OF ADMINISTRATION:

**Intraperitoneal**

(PROPOSED) INDICATION(S) FOR USE:

**Treatment of Chronic Renal Failure**

APPLICATION INFORMATION

APPLICATION TYPE

(check one)

NEW DRUG APPLICATION (21 CFR 314.50)

ABBREVIATED NEW DRUG APPLICATION (ANDA, 21 CFR 314.94)

BIOLOGICS LICENSE APPLICATION (21 CFR Part 601)

IF AN NDA, IDENTIFY THE APPROPRIATE TYPE

505 (b)(1)

505 (b)(2)

IF AN ANDA, OR 505(b)(2), IDENTIFY THE REFERENCE LISTED DRUG PRODUCT THAT IS THE BASIS FOR THE SUBMISSION

Name of Drug

Holder of Approved Application

TYPE OF SUBMISSION (check one)

ORIGINAL APPLICATION

AMENDMENT TO A PENDING APPLICATION

RESUBMISSION

PRESUBMISSION

ANNUAL REPORT

ESTABLISHMENT DESCRIPTION SUPPLEMENT

EFFICACY SUPPLEMENT

LABELING SUPPLEMENT

CHEMISTRY MANUFACTURING AND CONTROLS SUPPLEMENT

OTHER

IF A SUBMISSION OF PARTIAL APPLICATION, PROVIDE LETTER DATE OF AGREEMENT TO PARTIAL SUBMISSION: \_\_\_\_\_

IF A SUPPLEMENT, IDENTIFY THE APPROPRIATE CATEGORY

CBE

CBE-30

Prior Approval (PA)

REASON FOR SUBMISSION

**Response to Requets for Information 9/6, 9/7, and 9/19, 2001**

PROPOSED MARKETING STATUS (check one)

PRESCRIPTION PRODUCT (Rx)

OVER THE COUNTER PRODUCT (OTC)

NUMBER OF VOLUMES SUBMITTED **1**

THIS APPLICATION IS

PAPER

PAPER AND ELECTRONIC

ELECTRONIC

ESTABLISHMENT INFORMATION (Full establishment information should be provided in the body of the Application.)

Provide locations of all manufacturing, packaging and control sites for drug substance and drug product (continuation sheets may be used if necessary). Include name, address, contact, telephone number, registration number (CFN), DMF number, and manufacturing steps and/or type of testing (e.g. Final dosage form, Stability testing) conducted at the site. Please indicate whether the site is ready for inspection or, if not, when it will be ready.

Cross References (list related License Applications, INDs, NDAs, PMAs, 510(k)s, IDEs, BMFs, and DMFs referenced in the current application)

IND [ ] NDA 17-512 NDA 20-163 NDA 20-183 DMF [ ] DMF [ ]

DMF [ ]

This application contains the following items: (Check all that apply)	
<input type="checkbox"/>	1. Index
<input checked="" type="checkbox"/>	2. Labeling (check one) <input checked="" type="checkbox"/> Draft Labeling <input type="checkbox"/> Final Printed Labeling
<input type="checkbox"/>	3. Summary (21 CFR 314.50 (c))
<input type="checkbox"/>	4. Chemistry section
	A. Chemistry, manufacturing, and controls information (e.g., 21 CFR 314.50(d)(1); 21 CFR 601.2)
	B. Samples (21 CFR 314.50 (e)(1); 21 CFR 601.2 (a)) (Submit only upon FDA's request)
	C. Methods validation package (e.g., 21 CFR 314.50(e)(2)(i); 21 CFR 601.2)
<input type="checkbox"/>	5. Nonclinical pharmacology and toxicology section (e.g., 21 CFR 314.50(d)(2); 21 CFR 601.2)
<input type="checkbox"/>	6. Human pharmacokinetics and bioavailability section (e.g., 21 CFR 314.50(d)(3); 21 CFR 601.2)
<input type="checkbox"/>	7. Clinical Microbiology (e.g., 21 CFR 314.50(d)(4))
<input type="checkbox"/>	8. Clinical data section (e.g., 21 CFR 314.50(d)(5); 21 CFR 601.2)
<input type="checkbox"/>	9. Safety update report (e.g., 21 CFR 314.50(d)(5)(vi)(b); 21 CFR 601.2)
<input type="checkbox"/>	10. Statistical section (e.g., 21 CFR 314.50(d)(6); 21 CFR 601.2)
<input type="checkbox"/>	11. Case report tabulations (e.g., 21 CFR 314.50(f)(1); 21 CFR 601.2)
<input type="checkbox"/>	12. Case report forms (e.g., 21 CFR 314.50 (f)(2); 21 CFR 601.2)
<input type="checkbox"/>	13. Patent information on any patent which claims the drug (21 U.S.C. 355(b) or (c))
<input type="checkbox"/>	14. A patent certification with respect to any patent which claims the drug (21 U.S.C. 355 (b)(2) or (j)(2)(A))
<input type="checkbox"/>	15. Establishment description (21 CFR Part 600, if applicable)
<input type="checkbox"/>	16. Debarment certification (FD&C Act 306 (k)(1))
<input type="checkbox"/>	17. Field copy certification (21 CFR 314.50 (k)(3))
<input type="checkbox"/>	18. User Fee Cover Sheet (Form FDA 3397)
<input type="checkbox"/>	19. Financial Information (21 CFR Part 54)
<input type="checkbox"/>	20. OTHER (Specify)

**CERTIFICATION**

I agree to update this application with new safety information about the product that may reasonably affect the statement of contraindications, warnings, precautions, or adverse reactions in the draft labeling. I agree to submit safety update reports as provided for by regulation or as requested by FDA. If this application is approved, I agree to comply with all applicable laws and regulations that apply to approved applications, including, but not limited to the following:

1. Good manufacturing practice regulations in 21 CFR Parts 210, 211 or applicable regulations, Parts 606, and/or 820.
2. Biological establishment standards in 21 CFR Part 600.
3. Labeling regulations in 21 CFR Parts 201, 606, 610, 660, and/or 809.
4. In the case of a prescription drug or biological product, prescription drug advertising regulations in 21 CFR Part 202.
5. Regulations on making changes in application in FD&C Act Section 506A, 21 CFR 314.71, 314.72, 314.97, 314.99, and 601.12.
6. Regulations on Reports in 21 CFR 314.80, 314.81, 600.80, and 600.81.
7. Local, state and Federal environmental impact laws.

If this application applies to a drug product that FDA has proposed for scheduling under the Controlled Substances Act, I agree not to market the product until the Drug Enforcement Administration makes a final scheduling decision.

The data and information in this submission have been reviewed and, to the best of my knowledge are certified to be true and accurate.

**Warning:** A willfully false statement is a criminal offense, U.S. Code, title 18, section 1001.

SIGNATURE OF RESPONSIBLE OFFICIAL OR AGENT <i>Mary Kay Rybicki</i>	TYPED NAME AND TITLE Mary Kay Rybicki, Assoc. Dir., Regulatory Affairs	DATE 10/30/01
ADDRESS (Street, City, State, and ZIP Code) 1620 Waukegan Road McGaw Park, IL 60085	Telephone Number ( ) 847-473-6361	

Public reporting burden for this collection of information is estimated to average 24 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to:

Department of Health and Human Services Food and Drug Administration OSER, HFM-99 1401 Rockville Pike Rockville, MD 20852-1448	Food and Drug Administration CDER, HFD-94 12420 Parklawn Dr., Room 3046 Rockville, MD 20852
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An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

**DIVISION OF CARDIO-RENAL DRUG PRODUCTS  
FOOD AND DRUG ADMINISTRATION**



**US Mail address:**  
FDA/CDER/HFD-110  
5600 Fishers Lane  
Rockville, MD 20857

Woodmont II  
1451 Rockville Pike  
Rockville, MD 20852

This document is intended only for the use of the party to whom it is addressed and may contain information that is privileged, confidential, and protected from disclosure under applicable law. If you are not the addressee, or a person authorized to deliver the document to the addressee, you are hereby notified that any review, disclosure, dissemination, copying, or other action based on the content of this communication is not authorized. If you have received this document in error, please immediately notify us by telephone and return it to: CDER, DCRDP (HFD-110); 5600 Fishers Lane; Rockville, MD 20857

**Transmitted to FAX Number:** (847) 473-6952

**Attention:** Ms. Mary Kay Rybicki

**Company Name:** Baxter Healthcare Corporation

**Phone:** (847) 473-6361

**Subject:** FDA Participants,  
November 9, 2001 Teleconference

**Date:** November 16, 2001

**Pages including this sheet:** 2

**From:** Quynh Nguyen, Pharm.D.  
**Phone:** (301) 594-5311  
**Fax:** (301) 594-5494

Dear Mary Kay,

Per your request, please find attached a list of the FDA participants from the November 9, 2001 teleconference for NDA 21-321/Extraneal. If you have any questions, please do not hesitate to contact me at the above numbers.

Thanks.  
Quynh

**PLEASE LET ME KNOW YOU RECEIVED THIS. THANKS!**

**BAXTER HEALTHCARE CORPORATION**  
1620 Waukegan Road  
McGaw Park, IL 60085

## Fax Cover Sheet

DATE: November 13, 2001      TIME: 1:16 PM  
TO: Quynh Nguyen, Pharm.D.      PHONE: 301-594-5311  
    FDA/CDER/DCRDP              FAX: 301-594-5494  
FROM: M.K. Rybicki              PHONE: 847-473-6361  
    Baxter Regulatory Affairs      FAX: 847-473-6952  
RE: NDA 21-321, Extraneal (7.55 icodextrin) PDS  
CC:

Number of pages including cover sheet: 4

### Message

Dear Quynh:

Please find attached the proposed Clinical Studies and Serum Electrolytes sections of the Extraneal Labeling. This information is being provided in follow-up to the teleconference held on November 9, 2001. The Baxter attendees for that teleconference were:

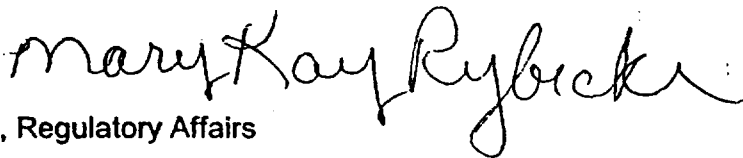
Richard Newman, PhD.  
VP Regulatory Affairs

Marsha Wolfson, M.D.  
VP Global Clinical Affairs

Please do not hesitate to contact me at 847-473-6361 if you have any questions.

Sincerely yours,

Mary Kay Rybicki  
Associate Director, Regulatory Affairs





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

**BAXTER HEALTHCARE CORPORATION**  
1620 Waukegan Road  
McGaw Park, IL 60085

## Fax Cover Sheet

**DATE:** November 14, 2001      **TIME:** 9:41 AM  
**TO:** Quynh Nguyen, Pharm.D.      **PHONE:** 301-594-5311  
FDA/CDER/DCRDP      **FAX:** 301-594-5494(5)  
**FROM:** Mary Kay Rybicki      **PHONE:** 847-473-6361  
Baxter Regulatory Affairs      **FAX:** 847-473-6952  
**RE:** NDA 21-321, Extraneal (7.5% icodextrin) PDS  
**CC:**

Number of pages including cover sheet: 17

Dear Quynh:

In follow-up to Baxter's conversation with Dr. Doug Throckmorton this morning, I am faxing to you a copy of draft labeling for Extraneal with changes discussed in the telephone conversation. Please note that the other changes requested at the November 9, 2001 teleconference have been incorporated except for the representation of the non-proprietary name and the statement requested at the end of the Carcinogenesis, Mutagenesis, Impairment of Fertility section. These two items are under discussion with the respective reviewers, with resolution expected later this week.

Thanks you for your help. Please do not hesitate to contact me at 847-473-6361 if you have any questions.

Mary Kay

*Mary Kay Rybecki*

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

## \*\* Transmit Conf. Report \*\*

P.1

Nov 14 2001 9:32

Fax/Phone Number	Mode	Start	Time	Page	Result	Note
93015945495	NORMAL	14. 9:32	6'01"	17	* O K	Manual

Mary Kay Rybicki  
11/19/2001 08:48 AM

To: THROCKMORTON@CDER.FDA.GOV  
cc: NGUYENQ@CDER.FDA.GOV  
Subject: EXTRANEAL NDA 21-321

**RE: Extraneal NDA 21-321, Draft Labeling - Serum Electrolytes- Change in Patient Numbers <125mmol/L for Control**

Dear Dr. Throckmorton:

Per your voicemail, Baxter is providing via E-mail the change in numbers of control patients whom developed serum sodium values less than 125 mmol/L. In the fax of November 14, 2001 the numbers of patients were described as 4 Extraneal and 3 control. During annotation of the proposed labeling, it was noted that one of the control patients participated in study RD-97-CA-130 and experienced a serum sodium value of < 125mmol/L at the last visit (4 weeks). This patient then rolled over into study RD-97-CA-131. The 4 week value from the 130 study became the 4 week value for the 131 study. Thus, this was one patient who had a serum sodium value < 125mmol/L at only one time point, but was counted twice.

The patients with serum sodium <125mmol/L are described below:

**CONTROL:**

Study 130 Patient 26102 Value= 124 at Week 4 (originally counted twice as this patient rolled over into study 131)  
Study 131 Patient 22301 Value= 124 at Week 39

**EXTRANEAL:**

Study 131 Patient 06201 Value= 124 at Week 13  
Study 131 Patient 18302 Value= 119 at Week 39  
Study 131 Patient 24301 Value= 124 at Week 39  
Study 131 Patient 32501 Value= 123 at Week 13 and Value= 124 at Week 26

The proposed serum electrolyte section, with annotation to NDA 21-321, should read as follows:

<b>Laboratory Tests</b>	
<b>Serum Electrolytes</b>	
	Volume 1.31 Page 077 Volume 1.38 Page 088 Volume 1.54 Page 062 Volume 1.34 page 272 Volume 1.45 Page 183 Volume 1.45 Page 214 Volume 1.45 Page 201 Volume 1.45 Page 218

Baxter will amend NDA 21-321 with the labeling changes provided by fax on November 13, 14 and the change described in this e-mail. In addition, discussions are anticipated to conclude today (November 19, 2001) with the Pharmacologist, Dr. Jim Willard, regarding the pre-clinical statement requested in the

teleconference of November 9, 2001. Baxter has been in discussion with Dr. Willard regarding his request to add the statment

to the Carcinogenesis, Mutagensis, and Impairment of Fertility section. Baxter does not agree that data support this statment.

Please do not hesitate to contact me at 847-473-6361 if you have any questions of comments.

Mary Kay Rybicki



NDA 21-321

INFORMATION REQUEST LETTER

Baxter Health Care Corporation  
Attention: Mary Kay Rybicki  
Associate Director, Regulatory Affairs  
1620 Waukegan Road  
McGaw Park, IL 60885-6730

Dear Ms. Rybicki:

Please refer to your December 20, 2000 new drug application (NDA) submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Extraneal (7.5% Icodextrin) Peritoneal Dialysis Solution.

We also refer to your submissions dated March 20, 2001 May 16, 2001 May 23, 2001 June 13, 2001.

We are reviewing the Chemistry, Manufacturing and Controls section of your submission and have the following comments and information requests. We request a prompt written response in order to continue our evaluation of your NDA.

**Regarding update of ML Laboratories DMF [redacted] for Icodextrin:**

There are some issues related to DMF [redacted] which need to be resolved. The DMF holder has been informed to address these issues and update their DMF as per Lorna Clisby's e-mail of April 20, 2001.

**Regarding Specifications of Icodextrin:**

Please include % Mass in Range (Molecular Weight Distribution) in the drug substance icodextrin specifications. Weight Average Molecular Weight (Mw), Number Average Molecular Weight (Mn) and % Mass in range (Mw) specifications should all be similar to those included in ML Laboratories specifications of drug substance icodextrin.

**Regarding Method Validation of the drug product:**

In the experimental design, please clearly describe the purpose of various control and test articles. For specificity, it was difficult to understand the purpose of test and control articles,

experimental design, and how the results proved the specificity of the method. Please clarify these issues.

To prove the ruggedness you have done re-assay of same solution after 24 hours which is not sufficient. Ruggedness is the ability of the procedure to provide analytical results of acceptable accuracy and precision under changed conditions of the test procedure. To prove the ruggedness please repeat the procedure taking into account the variations that may be expected when the same defined procedure of analysis is employed using different personnel, laboratories and equipment etc.

**Regarding Regulatory Specification of the drug product Extraneal (7.5% icodextrin) PDS:**

In addition to Number Average Molecular Weight and Weight Average Molecular Weight, please include % Mass in Range (Molecular Weight Distribution) in the regulatory and shelf-life specification of the drug product. Please also include an identification method in the product specification.

Extractables such as [redacted] should also be included in the regulatory specifications with limits.

**Regarding [redacted] Method Validation for the drug product Extraneal (7.5% icodextrin) PDS:**

Please provide a full method validation report for the [redacted] method for the parameters Number Average Molecular Weight, Weight Average Molecular Weight and % Mass in range (Mw).

**APPEARS THIS WAY  
ON ORIGINAL**



**Regarding stability protocols, stability data and expiration date of drug product:**

The \_\_\_\_\_ method alone cannot be considered stability indicating since breakdown of icodextrin to smaller units is also likely to contribute to overall specific \_\_\_\_\_. Therefore, the assay by \_\_\_\_\_ will not properly reflect degradation products and cannot be considered a stability indicating method. Please revise all stability protocols to include testing of Number Average Molecular Weight, Weight Average Molecular Weight and % Mass in range (Molecular Weight Distribution).

The stability data and supporting clinical stability data provided and not sufficient to approve an expiration date of 24 months; instead an expiration date of \_\_\_\_\_ months can be granted at this time.

**Regarding Extractable from containers:**

The stability data provided in this NDA includes some tests for extractable \_\_\_\_\_ items but you have not discussed the issue of extractables which is an important consideration for this product. The test for \_\_\_\_\_ was removed from the stability protocol of first three production lots (Table III from Vol. 1.4, page 190) and no explanation was given. You have not discussed or monitored \_\_\_\_\_ components in any of the stability studies. Please address these issues and provide full information about the possible extractable items and studies/tests for monitoring their levels in Extraneal. Please include all extractable products in the stability protocol of the first 3 post-approval production lots. Data from these studies will determine the extent to which further monitoring of annual commercial production batches will be necessary.

**Regarding labeling of the final product:**

Various -OH groups are missing but the bonds are still there which in standard organic chemistry terminology implies that there are CH<sub>3</sub> groups. The 1,4 linkage shown in the chemical structure of icodextrin in the package insert and various other places in the NDA represents the fragment "-CH<sub>2</sub>OCH<sub>2</sub>-" rather than "-O-". Please correct the icodextrin structure to remove the extra -CH<sub>2</sub> groups and to show all "-OH" groups. You may use the icodextrin structure similar to the one given in the USP Dictionary (2000) but including both 1,4 and 1,6 linkages.

The container labels (primary and secondary) have two different storage statements. Please revise the storage temperature statement on all labels including package insert to the following:

"Store at 20°C-25°C (68-77°F) [see USP Controlled Room Temperature]"

The adhesive labels provided have the container abbreviated as "CONT" which is confusing; please replace it with "CONTAINER". The adhesive labels also have too much information irrelevant to the actual label. Please provide copies of the adhesive labels with the final information, which will go on cardboard cartons and also submit a sample copy of the cardboard carton with adhesive label. The carton labels contain "7.5" in a rectangular box; please clarify its purpose and inform if this is the final format.

If you have any questions, call John Guzman, Regulatory Health Project Manager, at (301) 594-5312.

Sincerely,



Kasturi Srinivasachar, Ph.D.  
Chemistry Team Leader, DNDC I for the  
Division of Cardio-Renal Drug Products, HFD-110  
DNDC 1, Office of New Drug Chemistry  
Center for Drug Evaluation and Research

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

/s/

-----  
Kasturi Srinivasachar  
9/7/01 05:12:11 PM



NDA 21-321

Baxter Healthcare Corporation  
Attention: Steven Engel, PharmD  
1620 Waukegan Road  
McGaw Park, IL 60085

Dear Dr. Engel:

We have received your new drug application (NDA) submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for the following:

Name of Drug Product: Extraneal (icodextrin) 7.5% w/v PD Solution

Review Priority Classification: Standard (S)

Date of Application: December 22, 2000

Date of Receipt: December 22, 2000

Our Reference Number: NDA 21-321

Unless we notify you within 60 days of our receipt date that the application is not sufficiently complete to permit a substantive review, this application will be filed under section 505(b) of the Act on February 20, 2001 in accordance with 21 CFR 314.101(a). If the application is filed, the primary user fee goal date will be October 22, 2001 and the secondary user fee goal date will be December 22, 2001.

Please cite the NDA number listed above at the top of the first page of any communications concerning this application. All communications concerning this NDA should be addressed as follows:

U.S. Postal Service:

Food and Drug Administration  
Center for Drug Evaluation and Research  
Division of Cardio-Renal Drug Products,  
HFD-110  
Attention: Division Document Room  
5600 Fishers Lane  
Rockville, Maryland 20857

Courier/Overnight Mail:

Food and Drug Administration  
Center for Drug Evaluation and Research  
Division of Cardio-Renal Drug Products,  
HFD-110  
Attention: Division Document Room  
1451 Rockville Pike  
Rockville, Maryland 20852-1420

If you have any questions, please call:

NDA 21-321

Page 2

**Mr. John Guzman**  
**Regulatory Project Manager**  
**(301) 594-5312**

Sincerely,

A handwritten signature in black ink, appearing to be 'N.A.M.', written in a stylized, slanted font.

**Natalia A. Morgenstern**  
**Chief, Project Management Staff**  
**Division of Cardio-Renal Drug Products**  
**Office of Drug Evaluation I**  
**Center for Drug Evaluation and Research**