CENTER FOR DRUG EVALUATION AND RESEARCH

APPROVAL PACKAGE FOR:

APPLICATION NUMBER

21-388

Approval Letter(s)

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-388

Bryan Corporation
C/O
Waldman Biomedical Consultancy, Inc.
P.O. Box 575
Oceanside, NY 11572

Attention: Alan Waldman, Ph.D.
President
Waldman Biomedical Consultancy, Inc.

Dear Dr. Waldman:

Please refer to your new drug application (NDA) dated September 20, 2002, received September 23, 2002, submitted pursuant to 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Sterile Talc Powder®.

We acknowledge receipt of your submissions dated April 2 and 7; July 3 and 31; August 12; September 30 (2); October 8, 15, and 20, 2003.

The July 3 and August 12, 2003 submissions constituted a complete response to our March 21, 2003 action letter.

This new drug application provides for the use of Sterile Talc Powder® for administering intrapleurally via chest-tube as a sclerosing agent to decrease the recurrence of malignant pleural effusions in symptomatic patients.

We completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the agreed-upon labeling text and with the minor editorial revision below.

In the DOSAGE AND ADMINISTRATION section:

The recommended dose is 5 g, dissolved in 50 - 100 ml ~~sodium chloride~~ Sodium Chloride Injection, *USP*. Although the optimal dose for effective pleurodesis is unknown, 5 g was the dose most frequently reported in the published literature.

The final printed labeling (FPL) must be identical to the enclosed labeling submitted labeling. These revisions are terms of the NDA approval. Marketing the product(s) before making the

revisions, exactly as stated, in the product's labeling may render the product misbranded and an unapproved new drug.

Please submit an electronic version of the FPL according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format - NDA*. Alternatively, you may submit 20 paper copies of the FPL as soon as it is available but no more than 30 days after it is printed. Individually mount 15 of the copies on heavy-weight paper or similar material. For administrative purposes, designate this submission "**FPL for approved NDA 21-388**." Approval of this submission by FDA is not required before the labeling is used.

If you choose to use a proprietary name for this product, the name and its use in the labels must conform to the specifications under 21 CFR 201.10 and 201.15. We recommend that you submit any proprietary name to the Agency for our review prior to its implementation.

In addition, submit three copies of the introductory promotional materials that you propose to use for this product. Submit all proposed materials in draft or mock-up form, not final print. Send one copy to this division and two copies of both the promotional materials and the package insert directly to:

Division of Drug Marketing, Advertising,
and Communications, HFD-42
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

If you have any questions, call Sean Bradley, R.Ph., Regulatory Project Manager, at (301) 594-5770.

Sincerely,

{See appended electronic signature page}

/S/

Richard Pazdur, M.D.
Director
Division of Oncology Drug Products
Office of Drug Evaluation and Research 1
Center for Drug Evaluation and Research

Enclosure

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

/s/

Richard Pazdur
12/15/03 11:42:49 AM

CENTER FOR DRUG EVALUATION AND RESEARCH

APPROVAL PACKAGE FOR:

APPLICATION NUMBER

21-388

Approvable Letter (S)

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-388

Bryan Corporation
C/O
Waldman Biomedical Consultancy, Inc.
P.O. Box 575
Oceanside, NY 11572

Attention: Alan Waldman, Ph.D.
President
Waldman Biomedical Consultancy, Inc.

Dear Dr. Waldman:

Please refer to your new drug application (NDA) dated September 20, 2002, received September 23, 2002, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Sterile Talc Powder®.

We acknowledge receipt of your submissions dated October 23, and November 7, 13, and 22, 2002; February 9, 11, and 25, and March 4, 11, and 17 (2), 2003.

We also acknowledge receipt of your submission dated March 18, 2003. This submission was not reviewed for this action. You may incorporate this submission by specific reference as part of your response to the deficiencies cited in this letter.

We completed our review of this application, as submitted, with draft labeling, and it is approvable. Before the application may be approved, however, it will be necessary for you to:

1. This application fails to demonstrate successful product sterilization validation. Provide data to show successful dose verification studies for three validation lots. Subsequently you should also show successful final sterilization of those lots to achieve —

2. Demonstrate the absence of ——— from the newly validated samples considering that the sponsor had experienced difficulty in recovering these organisms.

In addition, you must submit final printed labeling (FPL) for the drug. The labeling should be identical in content to the enclosed labeling (text for the package insert) if you concur. If you wish to make revisions to the attached labeling, please submit updated labeling, not FPL.

Please submit the final printed labeling (FPL) electronically according to the guidance for industry titled Providing Regulatory Submissions in Electronic Format - NDA (January 1999). Alternatively, you may submit 20 paper copies of the FPL as soon as it is available but no more than 30 days after it is printed. Please individually mount ten of the copies on heavy-weight paper or similar material.

If additional information relating to the safety or effectiveness of this drug becomes available, revision of the labeling may be required.

In addition, submit three copies of the introductory promotional materials that you propose to use for this product. Submit all proposed materials in draft or mock-up form, not final print. Send one copy to the Division of Oncology Drug Products and two copies of both the promotional materials and the package insert directly to:

Division of Drug Marketing, Advertising, and Communications, HFD-42
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

Within 10 days after the date of this letter, you are required to amend this application, notify us of your intent to file (an) amendment, follow one of your other options under 21 CFR 314.110. If you do not follow one of these options, we will consider your lack of response a request to withdraw the application under 21 CFR 314.65. Any amendment should respond to all the deficiencies listed. We will not process a partial reply as a major amendment nor will the review clock be reactivated until all deficiencies have been addressed.

Under 21 CFR 314.102(d), you may request an informal meeting or telephone conference with the Division of Oncology Drug Products to discuss what steps need to be taken before the application may be approved.

The drug product may not be legally marketed until you have been notified in writing that the application is approved.

If you have any questions, call Sean Bradley, R.Ph., Regulatory Project Manager, at (301) 594-5770.

Sincerely,

{See appended electronic signature page}

Richard Pazdur, M.D.
Director
Division of Oncology Drug Products
Office of Drug Evaluation 1
Center for Drug Evaluation and Research

Enclosure

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/s/

Richard Pazdur
12/15/03 11:42:49 AM

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