CENTER FOR DRUG EVALUATION AND RESEARCH

APPROVAL PACKAGE FOR:

APPLICATION NUMBER

21-388

Microbiology Review(s)

Product Quality Microbiology Review

Consult review for HFD-150

22 August 2003

NDA:	NDA 21-388 BI
Name of Drug:	Sterile Talc Powder
Review Number:	1
Submission Date:	23, September 2002
Applicant:	Bryan Corporation
Name of Reviewer:	Vinayak Pawar
Conclusion:	The application is recommended for approval from microbiological standpoint.

Product Quality Microbiology Data Sheet

A. 1. **NDA:** NDA 21-388 BI

2. **REVIEW NUMBER:** 1

3. **REVIEW DATE:** 22 August, 2003

4. **TYPE OF SUPPLEMENT:** NA

5. **APPLICATION FOR:** A non-aerosol - Talc Powder

6. **APPLICANT/SPONSOR:**

Name: Bryan Corporation
Representative: c/o Dr. Alan Waldman
Telephone: 516-763-1158

7. **MANUFACTURING SITE:** ——

8. **DRUG PRODUCT NAME:**
Proprietary: Sterile Talc Powder
Non-proprietary:
Drug Priority Classification: High Priority

9. **DOSAGE FORM, ROUTE OF ADMINISTRATION AND STRENGTH/POTENCY:** —g vial, — g dose through a chest tube.

10. **METHOD (S) OF STERILIZATION:** Gamma Radiation

11. **PHARMACOLOGICAL CATEGORY:** Control pleural effusion.

B. 1. **DOCUMENT/LETTER DATE:** September 20, 2002
2. **RECEIPT DATE:** September 23, 2002
3. **CONSULT DATE:** October 8, 2002
4. **DATE OF AMENDMENTS:** July 3, 2003
5. **ASSIGNED FOR REVIEW:** October 21, 2002
6. **SUPPORTING/RELATED DOCUMENTS:** Amendment NDA 21-388 BI

C. **REMARKS:** The consult requests review of NDA 21-388 for a single use glass bottle containing sterile Talc Powder, on behalf of Bryan Corporation. The sterile talc is a non-aerosol version of Bryan Corporation's Sclerosol® Sterile Aerosol Talc. Volume 2 parts A and B of the original application and an amendment NDA 21-388/BI were submitted for review.

Executive Summary

I. Recommendations

A. Recommendation on Approvability -
The amended NDA application is able to demonstrate successful product sterilization validation of three Talc Powder lots. Therefore, from the microbiological standpoint, the application is recommended for approval.

B. Recommendation on Phase 4 Commitments and/or Agreements, if Approvable
NA

II. Summary of Microbiology Assessments

A. Brief Description of the Manufacturing Processes that relate to Product Quality Microbiology
See original NDA review.

B. Brief Description of Microbiology Deficiencies
None

C. Assessment of Risk Due to Microbiology Deficiencies-
None

III. Administrative

A. Reviewer's Signature /S/

B. Endorsement Block
Vinayak Pawar/22 August 2003
Peter H. Cooney/

C. CC Block
cc:
Original NDA 21-388
HFD-150/Division File/Sean Bradley

Redacted 3

pages of trade

secret and/or

confidential

commercial

information

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

/s/

Vinayak Pawar
9/10/03 11:36:42 AM
MICROBIOLOGIST

Peter Cooney
9/15/03 03:17:30 PM
MICROBIOLOGIST

Product Quality Microbiology Review

Consult review for HFD-150

19 March 2003

NDA:	NDA 21-388
Name of Drug:	Sterile Talc Powder
Review Number:	1
Submission Date:	23, September 2002
Applicant:	Bryan Corporation
Name of Reviewer:	Vinayak Pawar
Conclusion:	The application is approvable pending resolution of the sterilization validation issue cited

Product Quality Microbiology Data Sheet

A. 1. **NDA:** NDA 21-388

2. **REVIEW NUMBER:** 1

3. **REVIEW DATE:** 19 March, 2003

4. **TYPE OF SUPPLEMENT:** NA

5. **APPLICATION FOR:** A non-aerosol - Talc Powder

6. **APPLICANT/SPONSOR:**

Name: Bryan Corporation
Representative: c/o Dr. Alan Waldman
Telephone: 516-763-1158

7. **MANUFACTURING SITE:** ——

8. **DRUG PRODUCT NAME:**
Proprietary: Sterile Talc Powder
Non-proprietary:
Drug Priority Classification: High Priority

9. **DOSAGE FORM, ROUTE OF ADMINISTRATION AND STRENGTH/POTENCY:**– g vial, — g dose through a chest tube.

10. **METHOD (S) OF STERILIZATION:** Gamma Radiation

11. **PHARMACOLOGICAL CATEGORY:** Control pleural effusion.

B. 1. **DOCUMENT/LETTER DATE:** September 20, 2002
2. **RECEIPT DATE:** September 23, 2002
3. **CONSULT DATE:** October 8, 2002
4. **DATE OF AMENDMENTS:** NA
5. **ASSIGNED FOR REVIEW:** October 21, 2002
6. **SUPPORTING/RELATED DOCUMENTS:** Amendment NDA 21-388 BI

C. **REMARKS:** The consult requests review of NDA 21-388 for a single use glass bottle containing sterile Talc Powder, on behalf of Bryan Corporation. The sterile talc is a non-aerosol version of Bryan Corporation's Sclerosol® Sterile Aerosol Talc. Volume 2 parts A and B of the original application and an amendment NDA 21-388/BI were submitted for review.

Executive Summary

I. Recommendations

A. Recommendation on Approvability -
The NDA application fails to demonstrate successful product sterilization validation of three Talc Powder lots. Therefore, from the microbiological standpoint, the application is approvable pending resolution of the sterilization validation issue (see section H).

B. Recommendation on Phase 4 Commitments and/or Agreements, if Approvable
NA

II. Summary of Microbiology Assessments

A. Brief Description of the Manufacturing Processes that relate to Product Quality Microbiology
Sterile Talc Powder is manufactured by — and is filled in a single use 100-mL glass serum bottle, sealed with a gray 20mm stopper covered with a Flip-off seal, which is crimped into place. Each bottle contains — g of Talc USP. Following labeling each vial is placed into a — pouch which is sealed and placed into an "Inner Box" and the box is sealed. The inner boxes are then placed into "Outer Boxes" and shipped for gamma radiation sterilization to Contract Sterilizer – —

B. Brief Description of Microbiology Deficiencies
The application fails to demonstrate successful product sterilization validation of three lots. Of the three lots used in the dose verification studies, Lot 2E003 had no contamination, Lot 2E004 was marginally contaminated and Lot 2E005 showed unacceptable results. As a result final sterilization to achieve — — was not performed on Lot 2E005. See section H.

C. Assessment of Risk Due to Microbiology Deficiencies-

III. Administrative

A. Reviewer's Signature /S/

B. Endorsement Block
Vinayak Pawar/19 March 2003
Peter H. Cooney/

C. CC Block

cc:
Original NDA 21-388
HFD-150/Division File/Sean Bradley

APPEARS THIS WAY
ON ORIGINAL

Redacted 5

pages of trade

secret and/or

confidential

commercial

information

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

/s/

Vinayak Pawar
3/20/03 12:43:56 PM
MICROBIOLOGIST

Peter Cooney
3/20/03 01:35:34 PM
MICROBIOLOGIST