CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

22-052

MICROBIOLOGY REVIEW

Product Quality Microbiology Review

14 March 2007

NDA: 22-052

Drug Product Name
Proprietary: Zyflo XR.
Non-proprietary: zileuton controlled release tablets.
Drug Product Priority Classification: S

Review Number: 1

Dates of Submission(s) Covered by this Review

Letter	Stamp	Consult Sent	Assigned to Reviewer
30 July 2006	31 July 2006	08 March 2007	08 March 2007

Applicant/Sponsor
Name: Critical Therapeutics
Address: 60 Westview St.
Lexington, MA. 02421
Representative:
Telephone:

Name of Reviewer: John W. Metcalfe, Ph.D.

Conclusion: Approvable pending revision of deficiency.

Product Quality Microbiology Data Sheet

A. 1. **TYPE OF SUBMISSION:** Original NDA

2. **SUBMISSION PROVIDES FOR:** A new drug product.

3. **MANUFACTURING SITE:**

4. **DOSAGE FORM, ROUTE OF ADMINISTRATION AND STRENGTH/POTENCY:**
Solid, oral tablet.

5. **METHOD(S) OF STERILIZATION:** Not applicable.

6. **PHARMACOLOGICAL CATEGORY:** Info not provided.

B. **SUPPORTING/RELATED DOCUMENTS:** None.

C. **REMARKS:**
The consult request was made by the reviewing chemist. No paper jackets were provided for review. Information in the EDR was limited and did not include applicant cover letters or a 356h form. The consult request form contained information regarding the tablet manufacturing process and a rationale proposed by the applicant for not performing aerobic bacterial limits testing. The consult request poses the following questions:

> Is it appropriate for the applicant to not test for "aerobic bacterial limits"? If not, what information should they provide to assure the microbial quality of the finished drug product?

File Name: N022052R1.doc

Executive Summary

I. Recommendations

A. Recommendation on Approvability – NDA 22-052 is approvable from the standpoint of product quality microbiology.

B. Recommendations on Phase 4 Commitments and/or Agreements, if Approvable – Not applicable.

II. Summary of Microbiology Assessments

A. Brief Description of the Manufacturing Processes that relate to Product Quality Microbiology – [redacted]

B. Brief Description of Microbiology Deficiencies – The applicant has not provided a sufficient rationale for not performing aerobic bacterial limits testing on every batch of drug product.

C. Assessment of Risk Due to Microbiology Deficiencies – Not performing aerobic bacterial count testing of the drug product may result in a drug product which is contaminated with microorganisms.

III. Administrative

A. Reviewer's Signature _____
John W. Metcalfe, Ph.D.

B. Endorsement Block
Stephen Langille, Ph.D.

C. CC Block
In DFS

2 Page(s) Withheld

✓ § 552(b)(4) Trade Secret / Confidential

_____ § 552(b)(4) Draft Labeling

_____ § 552(b)(5) Deliberative Process

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/s/

John Metcalfe
3/14/2007 09:47:12 AM
MICROBIOLOGIST

Stephen Langille
3/14/2007 09:53:43 AM
MICROBIOLOGIST

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On Original