

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:
22-193

OTHER REVIEW(S)

NDA REGULATORY FILING REVIEW
(Including Memo of Filing Meeting)

NDA # 22193 Supplement # Efficacy Supplement Type SE-

Proprietary Name: Navstel
Established Name: balanced salt intraocular irrigating solution enriched with bicarbonate, dextrose, glutathione and hypromellose
Applicant: Alcon
Agent for Applicant (if applicable): Alcon Research

Date of Application: September 21, 2007
Date of Receipt: September 24, 2007
Date of Filing Meeting: November 6, 2007
Filing Date: November 22, 2007
Action Goal Date (optional): User Fee Goal Date: July 24, 2008

Indication(s) requested:

Type of Original NDA: (b)(1) (b)(2)
AND (if applicable)
Type of Supplement: (b)(1) (b)(2)

NOTE:

(1) If you have questions about whether the application is a 505(b)(1) or 505(b)(2) application, see Appendix A. A supplement can be either a (b)(1) or a (b)(2) regardless of whether the original NDA was a (b)(1) or a (b)(2). If the application or efficacy supplement is a (b)(2), complete Appendix B.

Review Classification: S X P
Resubmission after withdrawal? Resubmission after refuse to file?
Chemical Classification: (1,2,3 etc.) 3
Other (orphan, OTC, etc.)

Form 3397 (User Fee Cover Sheet) submitted: YES NO

User Fee Status: Paid Exempt (orphan, government)
Waived (e.g., small business, public health)

- Is there any 5-year or 3-year exclusivity on this active moiety in any approved (b)(1) or (b)(2) application? YES NO
If yes, explain:

Note: If the drug under review is a 505(b)(2), this issue will be addressed in detail in appendix B.

- Does another drug have orphan drug exclusivity for the same indication? YES NO
- If yes, is the drug considered to be the same drug according to the orphan drug definition of sameness [21 CFR 316.3(b)(13)]? YES NO

If yes, consult the Director, Division of Regulatory Policy II, Office of Regulatory Policy (HFD-007).

- Is the application affected by the Application Integrity Policy (AIP)? YES NO
If yes, explain:
- If yes, has OC/DMPQ been notified of the submission? YES NO
- Does the submission contain an accurate comprehensive index? YES NO
If no, explain:
- Was form 356h included with an authorized signature? YES NO
If foreign applicant, both the applicant and the U.S. agent must sign.
- Submission complete as required under 21 CFR 314.50? YES NO
If no, explain:
- Answer 1, 2, or 3 below (do not include electronic content of labeling as an partial electronic submission).

1. This application is a paper NDA YES
2. This application is an eNDA or combined paper + eNDA YES
This application is: All electronic Combined paper + eNDA
This application is in: NDA format CTD format
Combined NDA and CTD formats

Does the eNDA, follow the guidance?
(<http://www.fda.gov/cder/guidance/2353fnl.pdf>) YES NO

If an eNDA, all forms and certifications must be in paper and require a signature.

If combined paper + eNDA, which parts of the application were submitted in electronic format?

Additional comments:

3. This application is an eCTD NDA. YES
If an eCTD NDA, all forms and certifications must either be in paper and signed or be electronically signed.

Additional comments:

- Patent information submitted on form FDA 3542a? YES NO
- Exclusivity requested? YES, _____ Years NO
NOTE: An applicant can receive exclusivity without requesting it; therefore, requesting exclusivity is not required.
- Correctly worded Debarment Certification included with authorized signature? YES NO
If foreign applicant, both the applicant and the U.S. Agent must sign the certification.

NOTE: Debarment Certification should use wording in FD&C Act section 306(k)(1) i.e.,

"[Name of applicant] hereby certifies that it did not and will not use in any capacity the services of any person debarred under section 306 of the Federal Food, Drug, and Cosmetic Act in connection with this application." Applicant may not use wording such as "To the best of my knowledge"

- Are the required pediatric assessment studies and/or deferral/partial waiver/full waiver of pediatric studies (or request for deferral/partial waiver/full waiver of pediatric studies) included? YES NO
- If the submission contains a request for deferral, partial waiver, or full waiver of studies, does the application contain the certification required under FD&C Act sections 505B(a)(3)(B) and (4)(A) and (B)? YES NO
- Is this submission a partial or complete response to a pediatric Written Request? YES NO
If yes, contact PMHT in the OND-IO
- Financial Disclosure forms included with authorized signature? YES NO
(Forms 3454 and/or 3455 must be included and must be signed by the APPLICANT, not an agent.)
NOTE: *Financial disclosure is required for bioequivalence studies that are the basis for approval.*
- Field Copy Certification (that it is a true copy of the CMC technical section) YES NO
- PDUFA and Action Goal dates correct in tracking system? YES NO
If not, have the document room staff correct them immediately. These are the dates EES uses for calculating inspection dates.
- Drug name and applicant name correct in COMIS? If not, have the Document Room make the corrections. Ask the Doc Rm to add the established name to COMIS for the supporting IND if it is not already entered.
- List referenced IND numbers: 64,320
- Are the trade, established/proper, and applicant names correct in COMIS? YES NO
If no, have the Document Room make the corrections.
- End-of-Phase 2 Meeting(s)? Date(s) _____ NO
If yes, distribute minutes before filing meeting.
- Pre-NDA Meeting(s)? Date(s) _____ NO
If yes, distribute minutes before filing meeting.
- Any SPA agreements? Date(s) _____ NO
If yes, distribute letter and/or relevant minutes before filing meeting.

Project Management

- If Rx, was electronic Content of Labeling submitted in SPL format?
If no, request in 74-day letter. YES x NO
- If Rx, for all new NDAs/efficacy supplements submitted on or after 6/30/06:
Was the PI submitted in PLR format? YES x NO

If no, explain. Was a waiver or deferral requested before the application was received or in the submission? If before, what is the status of the request:
- If Rx, all labeling (PI, PPI, MedGuide, carton and immediate container labels) has been consulted to DDMAC? YES x NO
- If Rx, trade name (and all labeling) consulted to OSE/DMETS? YES x NO
- If Rx, MedGuide and/or PPI (plus PI) consulted to ODE/DSRCS?
N/A x YES NO
- Risk Management Plan consulted to OSE/IO? N/A x YES NO
- If a drug with abuse potential, was an Abuse Liability Assessment, including a proposal for scheduling submitted? NA x YES NO

If Rx-to-OTC Switch or OTC application: N/A

- Proprietary name, all OTC labeling/packaging, and current approved PI consulted to OSE/DMETS? YES NO
- If the application was received by a clinical review division, has DNPCE been notified of the OTC switch application? Or, if received by DNPCE, has the clinical review division been notified? YES NO

Clinical N/A

- If a controlled substance, has a consult been sent to the Controlled Substance Staff? YES NO

Chemistry

- Did applicant request categorical exclusion for environmental assessment? YES x NO
If no, did applicant submit a complete environmental assessment? YES x NO
If EA submitted, consulted to EA officer, OPS? YES x NO
- Establishment Evaluation Request (EER) submitted to DMPQ? YES x NO
- If a parenteral product, consulted to Microbiology Team? YES x NO

ATTACHMENT

MEMO OF FILING MEETING

DATE: November 6, 2007

NDA #: 22-193

DRUG NAMES: Navsel

APPLICANT: Alcon

Discipline/Organization

Reviewer

Medical:
Secondary Medical:
Pharmacology:
Secondary Pharmacology:
Chemistry:
Microbiology, sterility:
DSI:
Regulatory Project Management:
Other Consults:

William Boyd
Wiley Chambers
Conrad Chen
Wendy Schmidt
Chris Hough
Vinnie Pawar
consulted
Lori Gorski
DMETS

Per reviewers, are all parts in English or English translation? YES x NO
If no, explain:

CLINICAL FILE x REFUSE TO FILE

- Clinical site audit(s) needed? YES NO
If no, explain: perform routine audits as resources allow
- Advisory Committee Meeting needed? YES, date if known _____ NO x
- If the application is affected by the AIP, has the division made a recommendation regarding whether or not an exception to the AIP should be granted to permit review based on medical necessity or public health significance? N/A YES NO

CLINICAL MICROBIOLOGY N/A x FILE REFUSE TO FILE

STATISTICS N/A x FILE REFUSE TO FILE

BIOPHARMACEUTICS FILE x REFUSE TO FILE

- Biopharm. study site audits(s) needed? YES NO

PHARMACOLOGY/TOX N/A FILE x REFUSE TO FILE

- GLP audit needed? YES NO x

CHEMISTRY FILE x REFUSE TO FILE

- Establishment(s) ready for inspection? YES x NO
- Sterile product? YES x NO
- If yes, was microbiology consulted for validation of sterilization? YES x NO

ELECTRONIC SUBMISSION:

Any comments:

REGULATORY CONCLUSIONS/DEFICIENCIES:

(Refer to 21 CFR 314.101(d) for filing requirements.)

- The application is unsuitable for filing. Explain why:
- The application, on its face, appears to be well-organized and indexed. The application appears to be suitable for filing.
- x No filing issues have been identified.
- Filing issues to be communicated by Day 74. List (optional):

ACTION ITEMS:

1. Ensure that the review and chemical classification codes, as well as any other pertinent classification codes (e.g., orphan, OTC) are correctly entered into COMIS.
2. If RTF, notify everybody who already received a consult request of RTF action. Cancel the EER.
3. If filed and the application is under the AIP, prepare a letter either granting (for signature by Center Director) or denying (for signature by ODE Director) an exception for review.
4. If filed, complete the Pediatric Page at this time. (If paper version, enter into DFS.)
5. Convey document filing issues/no filing issues to applicant by Day 74.

Lori Gorski
Regulatory Project Manager

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

/s/

Lori Gorski
7/22/2008 02:48:02 PM
CSO

Lori Gorski
7/22/2008 02:48:39 PM
CSO