CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER: 200535Orig1s000

MICROBIOLOGY REVIEW(S)

Product Quality Microbiology Review

14 OCTOBER 2010

200-535/SD-14, -18 -19

Drug Product Name	
Proprietary:	None
Non-proprietary:	Oxycodone hydrochloride oral solution
Review Number:	2

Dates of Submission(s) Covered by this Review

-				
	Submit	Received	Review Request	Assigned to Reviewer
_	28 September 2010	28 September 2010	28 September 2010	28 September 2010
	01 October 2010	04 October 2010	na	na
	07 October 2010	07 October 2010	na	na

Submission History (for amendments only):

Submit Date(s)	Microbiology Review #	Review Date(s)
22 December 2009	1	22 September 2010

Applicant/Sponsor

Name: Address:	Lehigh Valley Technologies, Inc. 514 N. 12 th Street Allentown, PA 18102
Representative:	William Reightler
	Director, QA/Regulatory Affairs
Telephone:	610-782-9780 x18
Name of Reviewer:	Robert J. Mello, Ph.D.
Conclusion:	Recommend Approval

Product Quality Microbiology Data Sheet

- A. 1. **TYPE OF SUBMISSION:** 505(b)(2) NDA
 - 2. SUBMISSION PROVIDES FOR: Marketing Authorization
 - 3. MANUFACTURING SITE: Lehigh Valley Technologies, Inc. 514 N. 12th Street Allentown, PA 18102
 - 4. **DOSAGE FORM, ROUTE OF ADMINISTRATION AND STRENGTH/POTENCY:** Non-sterile, ^{(b) (4)} aqueous solution for oral administration, ^{(b) (4)} 20mg/ml.
 - 5. **METHOD(S) OF STERILIZATION:** Not Applicable
 - 6. **PHARMACOLOGICAL CATEGORY:** Opioid Analgesic

B. SUPPORTING/RELATED DOCUMENTS: None

C. **REMARKS**:

- This is an eCTD submission. The original PDUFA date is 22 October 2010.
- An Information Request was submitted by the Division on 23 September 2010 containing both chemistry and microbiology questions. The Microbiology issues raised in Microbiology Review #1 concerned batch identification codes used in the ^{(b) (4)}, a lack of microbial limits testing and a lack of control for *B. cepacia*. The Applicant's responses of 28 September 2010 (DARRTS Supporting Document 14) and 01 October 2010 (DARRTS Supporting Document 18) were acceptable in part except that the specification for total combined yeast and mold remained unacceptably high. An additional Information Request was transmitted on 06 October 2010. The Applicant responded on 07 October 2010 (DARRTS Supporting Document 19).

filename: N200535N000R2.doc

Executive Summary

- I. Recommendations
 - A. Recommendation on Approvability Recommend Approval
 - B. Recommendations on Phase 4 Commitments and/or Agreements, if Approvable $\rm N/A$
- II. Summary of Microbiology Assessments
 - A. Brief Description of the Manufacturing Processes that relate to Product Quality Microbiology – The drug product is a non-sterile (^{b) (4)} aqueous solution.
 - **B. Brief Description of Microbiology Deficiencies** None
 - C. Assessment of Risk Due to Microbiology Deficiencies N/A

III. Administrative

A. Reviewer's Signature: _

Robert J. Mello, Ph.D. Senior Microbiology Reviewer

- B. Endorsement Block: ______ John W. Metcalfe, Ph.D. Senior Microbiology Reviewer
- C. CC Block NDA 200535 file

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/s/

ROBERT J MELLO 10/14/2010

JOHN W METCALFE 10/14/2010 I concur.

Product Quality Microbiology Review

22 SEPTEMBER 2010

NDA:	200-535
Drug Product Name	
Proprietary:	None
Non-proprietary:	Oxycodone hydrochloride oral solution
Review Number:	1

Dates of Submission(s) Covered by this Review

Submit	Received	Review Request	Assigned to Reviewer
22 December 2009	22 December 2009	29 September 2010	20 September 2010
19 August 2010	20 August 2010	na	na

Submission History (for amendments only): NA

Applicant/Sponsor	
Name:	Lehigh Valley Technologies, Inc.
Address:	514 N. 12 th Street
	Allentown, PA 18102
Representative:	William Reightler
-	Director, QA/Regulatory Affairs
Telephone:	610-782-9780 x18
Name of Reviewer:	Robert J. Mello, Ph.D.
Conclusion:	Approvable pending resolution of product quality microbiology deficiencies. (See Section 3 "List of Product Quality Microbiology Deficiencies")

Product Quality Microbiology Data Sheet

- A. 1. TYPE OF SUBMISSION: 505(b)(2) NDA
 - 2. SUBMISSION PROVIDES FOR: Marketing Authorization
 - 3. MANUFACTURING SITE: Lehigh Valley Technologies, Inc. 514 N. 12th Street Allentown, PA 18102
 - 4. **DOSAGE FORM, ROUTE OF ADMINISTRATION AND STRENGTH/POTENCY:** Non-sterile, ^{(b) (4)} aqueous solution for oral administration, ^{(b) (4)} 20mg/ml.
 - 5. **METHOD(S) OF STERILIZATION:** Not Applicable
 - 6. **PHARMACOLOGICAL CATEGORY:** Opioid Analgesic

B. SUPPORTING/RELATED DOCUMENTS: None

C. **REMARKS**:

• This is an eCTD submission. The consult request asked for a review of the (b) (4). The August 19, 2010 amendment contained the latest version of the drug product specifications.

filename: N200535N000R1.doc

Executive Summary

I. Recommendations

- A. Recommendation on Approvability This submission is approvable pending resolution of product quality microbiology deficiencies. Please see Section 3, "List of Product Quality Microbiology Deficiencies," at the end of this review.
- B. Recommendations on Phase 4 Commitments and/or Agreements, if Approvable $\rm N/A$
- II. Summary of Microbiology Assessments
 - A. Brief Description of the Manufacturing Processes that relate to Product Quality Microbiology – The drug product is a non-sterile (^{b) (4)} aqueous solution.
 - **B. Brief Description of Microbiology Deficiencies** The drug product lacks a specification for microbial limits. Also, the drug product manufacturing process does not provide for control of *Burkholderia cepacia*.
 - C. Assessment of Risk Due to Microbiology Deficiencies Microbial limits testing of the drug product confirms a minimum degree of microbial control over the manufacturing process. Non-sterile drug products must also be free of objectionable organisms. *Burkholderia cepacia* is a potential human pathogen

B. cepacia could

proliferate in the drug product and cause disease in the patient.

III. Administrative

A. Reviewer's Signature: _

Robert J. Mello, Ph.D. Senior Microbiology Reviewer

B. Endorsement Block: _

John W. Metcalfe, Ph.D. Senior Microbiology Reviewer

C. CC Block

NDA 200535 file

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/s/

ROBERT J MELLO 09/22/2010

JOHN W METCALFE 09/22/2010 I concur.