

**CENTER FOR DRUG EVALUATION AND RESEARCH**

**APPLICATION NUMBER:NDA 20-353/S-001**

**CORRESPONDENCE**



9.1

Food and Drug Administration  
Rockville MD 20857

Date MAR - 4 1996

NDA No. 20-353

ELAN PHARMACEUTICAL RESEARCH CORPORATION  
1300 Gould Drive  
Gainesville, Georgia 30504-3947

Attention: Sharon L. Hamm, Pharm.D., R.Ph.  
Head, North America Regulatory Affairs and Compliance

Dear Sir/Madam:

We acknowledge receipt of your supplemental application for the following:

Name of Drug: NAPRELAN (naproxen sodium) Controlled Release Tablets

NDA Number: 20-353

Supplement Number: S-001

Date of Supplement: February 15, 1996

Date of Receipt: February 16, 1996

All communications concerning this NDA should be addressed as follows:

Center for Drug Evaluation and Research  
Attention: Document Control Room N115  
9201 Corporate Blvd.  
Rockville, MD 20850

Sincerely yours,

Consumer Safety Officer  
Division of Anti-Inflammatory, Analgesic,  
and Dental Drug Products (HFD-550)  
Office of Drug Evaluation  
Center for Drug Evaluation and Research

9.1

NDA 20-353

MAR 28 1996

Elan Pharmaceutical Research Corp. —  
Attention: Sharon L. Hamm, Pharm.D., R. Ph.  
1300 Gould Drive  
Gainesville, Georgia 30504-3947

Dear Dr. Hamm:

We acknowledge the receipt of your March 11, 1996 submission containing the final printed package insert labeling in response to our January 5, 1996 letter approving your new drug application (NDA) for NAPRELAN (naproxen sodium tablets) CONTROLLED-RELEASE TABLETS, 375 mg, 500 mg and 750 mg.

We have reviewed the labeling that you have submitted in accordance with our January 5, 1996 approval letter, and we find it acceptable.

We are requesting at the next printing or within six months, whichever comes first, that the following revision be made:

The use of the established name "naproxen sodium tablets", should be incorporated in both your labels and labelings.

Sincerely yours,

WAC 3/27/96

Wiley A. Chambers, M.D.  
Acting Director  
Division of Anti-Inflammatory, Analgesic  
and Ophthalmic Drug Products (HFD-550)  
Office of Drug Evaluation V  
Center for Drug Evaluation and Research

cc: NDA 20-353  
HF-2/MedWatch (with labeling)  
HFD-80 (with labeling)  
HFD-240 (with labeling)  
HFD-550/DivDir/Chambers  
HFD-550/MO/KJohnson  
HFD-550/CHEM/BHo  
HFD-550/Pharm/WCoulter  
HFD-550/Clin/MChang (with labeling)  
HFD-550/CSO/SLin  
HFD-550/Rjoyce  
HFD-638 (with labeling)  
HFD-880/Bashaw  
Revised 3/27/96 by RDJoyce *RDJ 3/27/96*

**ACKNOWLEDGE & RETAIN (AR)**



March 11, 1996

*Sue Lin*  
SUPPL NEW CORRESP



Wiley Chambers, M.D., Acting Director  
Division of Anti-Inflammatory Analgesic & Ophthalmic Drug Products  
HFD-550  
Attention: Document Control Room  
Food and Drug Administration  
9201 Corporate Blvd.  
Rockville, MD 20850

**RE: NDA 20,353 Naprelan (Naproxen Sodium) Tablets  
S-01 Additional Correspondence**



Dear Dr. Chambers:

Reference is made to our pending supplemental application for a change in the labeling for Naprelan (naproxen sodium), and our original submission dated February 15th and follow-up correspondence, March 5th. As per my telephone correspondence with Sue Lin of your division, please find enclosed in Attachment 1 a Word Perfect disk (Word Perfect 5.2) copy of the package insert. The disk copy contains two versions of the package insert, the first of which (document re010596.wp) incorporates 25 revisions made to the package insert from the final printed labeling which was part of our January 5th Approval letter. The 25 revisions are listed in detail under Attachment 2, in textual format, with a cross-reference to the final package insert printing for ease of reference. These revisions predominately represent grammatical or typographical errors.

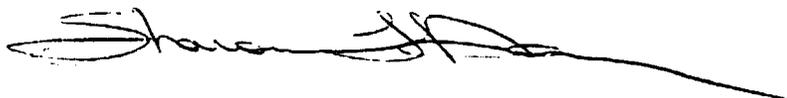
Also, enclosed on the disk (document fpi31196.wp) is the proposed revision in the package insert text, which incorporates two additional revisions (numbers 26 & 27). Revision #26 corrects a grammatical error in the Adverse Event listing placing a comma following "coordination abnormal" and "diplopia". The second revision (number 27) is to address deletion of the sentence in Precautions, which was the principle subject of this supplemental application. Enclosed under Attachment 3 is a detailed listing of all 27 revisions, along with an annotated package insert for your reference. We have also enclosed under Attachments 4 & 5 respectively, hard copy printouts of the disk insert versions, for completeness of documentation.

As we are anxious for completion of the review and approval of this pending supplemental application, we hope that the enclosed details will expedite your review. We encourage you to contact us if there are any further questions on this application. Thank you.

**élan pharmaceutical research corp.**

1300 Gould Drive, Gainesville, Georgia 30504-3947, USA  
Telephone: (770) 534-8239. Fax: (770) 534-8247

Sincerely,

A handwritten signature in black ink, appearing to read 'Sharon Hamm', with a long horizontal flourish extending to the right.

Sharon Hamm, *Pharm. D., R.Ph*  
*Head, North America Regulatory Affairs & Compliance*

SH:tf

K:\NA\SUBM\FD831194.DOC\3/11/96 5:20 PM

ORIGINAL



NDA NO. 20,353 REF. NO. 001  
NDA SUPPL FOR SAR



February 15, 1996

Wiley Chambers, M.D., Acting Director  
Division of Anti-Inflammatory, Analgesic and  
Dental Drug Products - HFD550  
ATTN: Document Control Room  
Food and Drug Administration  
9201 Corporate Blvd  
Rockville, Md 20850

**RE: NDA 20,353 - Naprelan™ (naproxen sodium) Controlled Release Tablets  
Supplement - Labeling Change**

**SUPPLEMENT - EXPEDITED REVIEW REQUESTED**

Dear Dr. Chambers:

While in the process of finalizing our package insert printing, we became aware of a significant transcription error contained within the proposed final printed labeling for Naprelan, which was inadvertently included. We were advised to use the EC-Naprosyn™ (naproxen) labeling as a format guide for the labeling of our product and as a result, included by mistake a sentence which is specific to EC-Naprosyn and would not be applicable to Naprelan. As a result of this error, we are hereby requesting under expedited review a revision to the package insert deleting the one sentence which was affected.

Specifically, as can be seen from the enclosed mock-up revision (Attachment 1), within "PRECAUTIONS", just prior to the subheading "Drug/Laboratory Test Interactions" is the statement:

"Due to the gastric pH elevating effects of H<sub>2</sub>-blockers, sucralfate, and intensive antacid therapy, concomitant administration of NAPRELAN is not recommended."

Enclosed as Attachment 2 is a copy of the EC-Naprosyn package insert text, which highlights (page 2) this statement, which was specifically created for EC-Naprosyn, as a result of its enteric

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coating. The potential interaction is therefore limited only to EC-Naprosyn and was inadvertently included in the Naprelan package insert.

We believe it is critical to resolve this issue in advance of any launch activities, or finalization of labeling for product distribution and would therefore request your expedited review of this supplement, following which revised final printed labeling would be provided.

Thank you in advance for your support. Please feel free to contact me should you have any further questions regarding this application.

Sincerely,



Sharon L. Hamm, *Pharm.D., R.Ph.*  
*Head, North America Regulatory Affairs  
and Compliance*

SH/bh



ORIGINAL  
BL  
NDA SUPPL AMENDMENT

VIA FACSIMILE AND FEDERAL EXPRESS

March 5, 1996



Wiley Chambers, M.D., Acting Director  
Division of Anti-Inflammatory, Analgesic and  
Dental Drug Products - HFD550  
ATTN: Document Control Room  
Food and Drug Administration  
9201 Corporate Blvd  
Rockville, Md 20850

**RE: NDA 20,353 - Naprelan™ (naproxen sodium) Controlled Release Tablets  
Supplement 01 - Labeling Change (Corrected Correspondence)**

SUPPLEMENT - EXPEDITED REVIEW REQUESTED

Dear Dr. Chambers:

Reference is made to our Supplemental Application for a change in "Precautions" labeling for Naprelan (naproxen sodium) Controlled Release Tablets. Reference is also made to our previous correspondence of February 15, 1996 wherein this change was originally requested.

Upon review of our internal documentation, we recognized that the package insert submitted in the February 15 supplement and identified as Attachement 1 was in error. Please find attached the correct version of the package insert for Naprelan without the change in Precautions as previously discussed. This package insert reflects that previously approved with the exception of minor grammatical corrections.

***élan pharmaceutical research corp.***

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Telephone: (770) 534-8239. Fax: (770) 534-8247

We sincerely apologize for any inconvenience this may have caused.

Thank you again for your support in review of this supplemental application.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sharon L. Hamm".

Sharon L. Hamm, Pharm.D., R.Ph.  
Head, North America Regulatory Affairs  
& Compliance

SH/bh

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