CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:NDA 20-587

CORRESPONDENCE

Bryan
CORPORATION
Four Plympton Street•Woburn, Massachusetts 01801 U.S.A.
617-935-0004•Fax 617-935-7602

DUPLICATE

January 30, 1996

Ms. Debbie Catterson
Food and Drug Administration
Oncology Division
1451 Rockville Pike
Rockville, MD 20857

Attention: **NDA#20-587 Sclerosol**

Dear Debbie:

Please find enclosed a copy of a letter written by Dr. John Beamis explaining the need for two different length catheters provided with the Sterile Aerosol Talc.

If there are any questions, please feel free to contact me.

Sincerely,

Frank M. Abrano
President

enclosure

Bryan
CORPORATION
[illegible] Street•Woburn, Massachusetts 01801 U.S.A.
[illegible]•Telex 710-348-1337•Fax 617-935-7602

November 8, 1995

Ms Debbie Catterson
Food and Drug Administration
Oncology Division
1451 Rockville Pike
Rockville, MD 20857

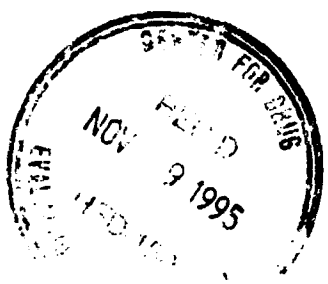
Reference: NDA# 20-587 Sterile Aerosol Talc

Following our telephone conversation of today, will be responsible for the labeling containing instructions for use which will be placed in the outer package within the sterile field. There will also be another label that will be placed on the outside of the package by with the description of the contents. Both the lot number and the expiration date will be stamped on the rear of the package.

If any further information is necessary, please feel free to contact me directly.

Sincerely,

Frank M. Abrano
Chief Executive Officer



Bryan
CORPORATION
Four Plympton Street•Woburn, Massachusetts 01801 U.S.A.
617-935-0004•Fax 617-935-7602

DUPLICATE

January 24, 1996

Ms. Debbie Catterson
Food and Drug Administration
Oncology Division
1451 Rockville Pike
Rockville, MD 20857

ORIG AMENDMENT
(BI), BM

Attention: **NDA# 20-587 Sclerosol**

Dear Ms. Catterson:

As a follow up to your fax of January 3, 1996, we are submitting to you information concerning the microbiology testing. We hope that this information is sufficient.

Concerning the question regarding safety, we refer to the reply of It is indicated that "We do not have any written claim on the subject." Bryan Corporation has never received any written complaints or telephone calls concerning this subject.

As soon as additional information becomes available to us from the French we will submit these documents to you.

Sincerely,

Frank M. Abrano
President

enclosure

CENTER FOR DRUG EVALUATION AND RESEARCH
RECD
JAN 26 1996

Bryan
CORPORATION
Four Plympton Street • Woburn, Massachusetts 01801 U.S.A.
617-935-0004 • Fax 617-935-7553

ORIGINAL

December 19, 1995

Ms Debbie Catterson
Food and Drug Administration
Oncology Division
1451 Rockville Pike
Rockville, MD 20857

NEW
(NC)

Attention: NDA# 20-587 Sterile Aerosol Talc

Dear Ms. Catterson:

Please find enclosed a letter from who we have engaged for the microbiological testing of our product Sclerosol™ Sterile Aerosol Talc.

If there are any questions, feel free to contact me.

Sincerely,

Frank M. Abrano
President

Telephone 1-800-343-7711

Monday, December 18, 1995

Frank Abrano
Bryan Corporation
4 Plympton Street
Woburn, MA 01801

Dear Frank:

In response to our meeting on Friday, December 15, 1995, I am pleased to inform you that has the ability to perform the tests we discussed. Enclosed please find a confidentiality agreement which you need to sign, date and return to me as soon as possible.

As we discussed, plans to perform the following tests on Bryan Corporation product Sclerosol™:

* the spray nozzle & delivery tube per USP 23 (40 units per lot)
* the canister per USP 23 (40 units per lot)
* a sample of the product per USP 23 (40 units per lot)
* bacteriostasis & fungistasis for spray nozzle, delivery tube, canister and finished product (one time per product)
* bulk sterility on talc per USP 23

is a full service toxicology and environmental chemistry laboratory that is certified by the FDA (#1220528), USDA (#14-R-101), AAALAC, OPRR Welfare Ass. (#A3223-01) and the DEA.

Once again, thank you for your interest in If you have any questions or need additional assistance please do not hesitate to call me.

Sincerely,

Jill A. Finneran

Bryan
CORPORATION
Four Plympton Street•Woburn, Massachusetts 01801 U.S.A.
617-935-0004•Fax 617-935-7602

ORIGINAL

December 18, 1995

Debbie Catterson
Food and Drug Administration
Oncology Division
1451 Rockville Pike
Rockville, MD 20857

NEW

Reference: NDA# 20-587

Dear Ms. Catterson:

Please find enclosed a copy of the original letter that was sent to Nancy Haggard whereas Bryan Corporation wishes to withdraw the firm of for microbiological testing of Sclerosol™ sterile aerosol talc and replace it with

If there are any questions, please feel free to contact me.

Sincerely,

Frank Abrano
President

Bryan
CORPORATION
Four Plympton Street•Woburn, Massachusetts 01801 U.S.A.
617-935-0004•Fax 617-935-7602

ORIGINAL

December 8, 1995

Nancy Haggard/Associate Director
International and Technical Operations Branch
U.S. Food and Drug Administration
5600 Fishers Lane, Room 12-18, HFC134
Rockville, MD 20857

Reference: NDA# 20-587

NC

Dear Ms Haggard:

As a followup to our telephone conversation today, please be advised that Bryan Corporation has decided to withdraw the firm of for microbiology testing of Sclerosol™, sterile aerosol talc for NDA# 20-587. Bryan Corporation will now enter into an agreement with for determination of the prescence of bacteria, yeast, or mold in a cosmetic, pahrmaceutical, or food preparation.

Our first meeting with is scheduled for December 15, 1995. We will forward a letter of engagement with as soon as it is available. We will keep you advised of all further activity.

If there are any questions or concerns you may have, please feel free to contact me.

Sincerely,

Frank Abrano
President

Bryan
CORPORATION
Four Plympton Street•Woburn, Massachusetts 01801 U.S.A.
617-935-0004•Fax 617-935-7602

DUPLICATE

NEW CORRESP

October 21, 1996

Ms. Debra Catterson
Project Manager
Office of Drug Evaluation
Center for Drug Evaluation and Research
Food and Drug Administration
Rockville, MD 20857

RE: NDA 20-587
Sclerosol Intrapleural Aerosol
(Sterile Talc Powder)

Dear Ms. Catterson:

Thank you for taking the time to talk to me and Dr. John Sciarra several days ago. As indicated to you during our phone conversation, we are in need of some guidance before we can fully respond to the questions raised by the Chemistry Section (Letter of August 9, 1996 to us from Dr. Robert Temple). Several changes in our NDA20-587 have become necessary due to certain occurrences. The changes we are contemplating at the present time include:

1. Drug Substance

Our NDA 20-587 indicates that the raw material (talc) will be supplied by We plan to use Talc, Ultra 2000 supplied by

This company is based in the United States and is one of the largest suppliers of talc to the pharmaceutical and cosmetic industries. We are enclosing a "Certificate of Analysis" for this grade of talc and you will note that it meets the J-41 test for asbestos, CTFA requirements for mold and bacteria, and meets USP standards.

Both its physical and chemical properties are comparable to Talc Bryan Corporation wishes to use the talc supplied by rather than the one supplied by because has assured us of a steady supply and have been willing to supply the information requested by the FDA. They have been most cooperative with us and we feel it is best to use as our supplier.

2. Propellant

The propellant for this product is dichlorodifluoromethane (Propellant 12) and will be supplied by

are the two largest suppliers of aerosol propellants for metered dose inhalers and other pharmaceutical aerosols in the United States and their manufacturing facilities have been inspected by the FDA. Additionally, they each have a DMF on file with the FDA and have supplied full documentation on dichlorodifluoromethane. The supplier listed in our NDA 20-587 is not a supplier here in the United States and we would have much difficulty in obtaining the necessary documentation and supplies.

3. Manufacturer

In order to assure greater control over our product, we wish to produce Sclerosol Intrapleural Aerosol here in the United States. Sciarra Laboratories, Inc., located at 485-09 South Broadway, Hicksville, N.Y. 11801 is equipped to produce metered dose aerosols and related pharmaceutical aerosols. The talc powder aerosol can be packaged on their fully automated packaging line which is capable of filling about units/minute. A brochure is attached which describes the facility and includes a listing of the available equipment. Sciarra Laboratories, Inc. is a small, family owned business devoted exclusively to the development of pharmaceutical aerosols and the packaging of small sized pharmaceutical aerosols (metered dose inhalers) and products such as the sterile aerosol talc.

A resume indicating the background of Dr. Sciarra is included. He has spent the past 40 years as an educator at several colleges of Pharmacy and at the same time, served as a Consultant to the pharmaceutical industry on metered dose inhalers and related pharmaceutical aerosols. He has been involved in the development of many of the currently available metered dose inhalers and other pharmaceutical aerosols

4. Sterilization

This final package will be by

They are one of the largest facilities here on the east coast and capable of our product. They were last inspected by the FDA on August 9, 1995 and have DMF describing their facility.

will determine the sterility of the final product. They were last inspected by the FDA on February, 1996 and are fully capable of performing these studies.

5. Packaging Components

The valve, canister, actuator and cannulas will be supplied by the same companies listed in our NDA 20-587. No change in these components are contemplated. Since the talc is inert, canister and valve are the same as previously used, there should be no change in the behavior of the product upon dispensing. A comparison of the product produced in the United States will be compared with the product produced in France as to

Pressure
Moisture
Particle Size (Plume Geometry)
Delivery Rate
Amount Delivered/Canister
Leakage

so that the similarity of both products can be noted.

6. Other Considerations

There will be no change in the formulation itself. It will consist of Since the formulation, propellant, valve and actuator are responsible for delivering the talc in the desired way and the talc will have essentially the same particle size distribution, the product produced in the United States should be the same as the ones produced in France.

However, Bryan Corporation will have greater control over the entire production and packaging operation by having the product made in the United States.

We are requesting the FDA to consider the acceptability of these changes so that the necessary documentation can be prepared and submitted. This submission can be prepared in a relatively short period of time. If these changes are satisfactory, then we can respond to the deficiencies indicated in the letter of August 9, 1996 as they pertain to the talc, Sciarra Laboratories, Inc. as well as the facilities to be used for and sterility testing.

We appreciate the time you have given to us and look forward to a teleconference call with you and the appropriate reviewers of the FDA staff.

Sincerely,

Frank Abrano
President

FA/gd

cc: Dr. John J. Sciarra