

**CENTER FOR DRUG EVALUATION AND RESEARCH**

**Application Number** 21-038

**CHEMISTRY REVIEW(S)**

N21038

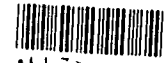
on #21-038

HFD-170

K1.3



N21038\*



K1.3\*

DRUG NAME: Precedex (dexmedetomidine hcl injection)

APPLICANT: ABBOTT LABORATORIES

REC.  
12/28/99

CHEMICAL & THERAPEUTIC CLASS:1S

### Review Cycles

<b>Review Cycle: 1</b> <b>Submission Date:12-18-98</b> <b>Receipt Date:12-18-98</b> <b>Goal Date:12-18-99</b> <b>Action:AP</b>	<b>Review Cycle: 2</b> <b>Submission Date:</b> <b>Receipt Date:</b> <b>Goal Date:</b> <b>Action:</b>
<b>Review Cycle: 3</b> <b>Submission Date:</b> <b>Receipt Date:</b> <b>Goal Date:</b> <b>Action:</b>	<b>Review Cycle: 4</b> <b>Submission Date:</b> <b>Receipt Date:</b> <b>Goal Date:</b> <b>Action:</b>

### CORE REVIEW TEAM MEMBERS

<b>PROJECT MANAGER/ CSO :Susmita Samanta</b> <b>Phone # &amp; Office Room #:301-827-7410, 9B-45</b>
<b>MEDICAL:Patricia Hartwell, M.D., M.B.A.</b>
<b>CHEMISTRY:Michael Theodorakis, Ph.D.</b>
<b>PHARM/TOX:Harry Geyer, Ph.D.</b>
<b>BIOPHARMACEUTICS:Suresh Doddapaneni, Ph.D.</b>
<b>BIOMETRICS: Z.Jonathan Ma, Ph.D.</b>
<b>ABUSE LIABILITY: BeLinda A. Hayes, Ph.D.</b>
<b>MICROBIOLOGIST: Patricia Hughes, Ph.D.</b>

### Volume 3 of 4

Administrative volume #(s): 1

Clinical volume #(s): 2

CMC volume #(s): 3

Pharmacology/Toxicology volume #(s): 4

## ODE II ACTION PACKAGE TABLE OF CONTENTS

Application #21-038

Drug Name: Precedex (dexmedetomidine Hydrochloride injection), 2 mL ampule/2 mL vial, 100 mcg/mL

Applicant: Abbott Laboratories

Chem./Ther. Type: 1S

CSO/PM: Susmita Samanta

Phone: 301-827-7410

HFD-170

Original Application Date: December 18, 1998 Original Receipt Date: December 18, 1998

**CURRENT USER FEE GOAL DATE: December 18, 1999** Date Table of Contents Completed: 9/13/99

**Section A:**

**Administrative Information**

X (completed),  
N/A (not applicable),  
or Comment

Tab A-1	Action Letter(s)	Current Action: AP _____	X
Tab A-2	Phase 4 Commitments:		X
	a. Copy of applicants communication committing to Phase 4 .....		NA
	b. Agency Correspondence requesting Phase 4 Commitments .....		NA
Tab A-3	FDA revised Labels & Labeling and Reviews: (Separate each version/cycle with a colored sheet)		X
	a. Package Insert .....		X
	b. Immediate Container and Carton Labels .....		NA
Tab A-4	Original Proposed Labeling .....		X
Tab A-5	Foreign Labeling:		X
	a. Foreign Marketing History .....		NA
	b. Foreign Labeling and Review(s) .....		NA
Tab A-6	Labeling and Nomenclature Committee's Tradename Review .....		X
Tab A-7	Summary Memoranda (e.g., Division Director, Group Leader, Office) .....		X
Tab A-8	Copy of Patent Statement .....		X
	Exclusivity Checklist (and any requests for exclusivity) .....		X
	Debarment Statements .....		X
Tab A-9	Correspondences, Faxes, & Telecons .....		X
Tab A-10	Minutes of Meetings:		X
	a. End-of-Phase II meeting .....		NA
	b. Pre-NDA meeting(s) .....		NA
	c. Filing meeting .....		X
	d. Other meetings .....		X
Tab A-11	Advisory Committee Meeting:		X
	a. Questions Considered by the committee .....		NA
	b. List of Attendees .....		NA
	c. 24 hour alert memorandum .....		NA
Tab A-12	Project Management Administrative Information (optional) .....		X

**ODE II ACTION PACKAGE TABLE OF CONTENTS (continued)**

Application #21-038 Drug Name: Dexmedetomidine HCL

**Section B:**

**Clinical Information**

X (completed),  
N/A (not applicable),  
or Comment

Tab B-1	Clinical Reviews and Memoranda .....
Tab B-2	Safety Update Reviews .....
Tab B-3	Pediatric Page .....
Tab B-4	Statistical (Clinical) Review and Memoranda .....
Tab B-5	Biopharmaceutics Review and Memoranda .....
Tab B-6	Abuse Liability Review .....
Tab B-7	DSI Audits .....
Tab B-8	Summary of Efficacy (from the summary volume of the application) .....
Tab B-9	Summary of Safety (from the summary volume of the application) .....

X
X
X
X
X
X
X
NA
NA

**Section C:**

**Chemistry, Manufacturing, and Controls (CMC) Information**

X (completed),  
N/A (not applicable),  
or Comment

Tab C-1	CMC Reviews and Memoranda .....
Tab C-2	DMF Reviews .....
Tab C-3	EA Reviews/FONSI .....
Tab C-4	Micro Review (validation of sterilization) .....
Tab C-5	Statistical Review of drug stability .....
Tab C-6	Inspection of facilities => Decision: _____ Date: _____
Tab C-7	Methods Validation Information .....

X
X
X
X
NA
X
PENDING

**Section D:**

**Pharmacology/Toxicology Information**

X (completed),  
N/A (not applicable),  
or Comment

Tab D-1	Pharmacology/Toxicology Reviews and Memoranda .....
Tab D-2	Carcinogenicity Review (statistical) .....
Tab D-3	CAC/Executive Committee Report .....

X
NA
NA

**ADDITIONAL NOTES:**

---



**Hospital Products Division**

Abbott Laboratories  
D-389, Bldg. AP30  
200 Abbott Park Road  
Abbott Park, Illinois 60064-6157

**REQUEST FOR A CATEGORICAL EXCLUSION  
OF THE REQUIREMENTS OF AN ENVIRONMENTAL IMPACT REPORT**

Abbott Laboratories hereby requests a CATEGORICAL EXCLUSION of the requirements of an Environmental Impact Report under the provisions of 21 CFR 35.24.

A CATEGORICAL EXCLUSION may be granted if the drug product will not be administered at higher dosage levels, for longer duration, or for different indications than were previously in effect and if data available to the Agency do not establish that at the expected level of exposure, the substance may be toxic to organisms in the environment.

We attach a certification of environmental compliance on the following page.

ABBOTT LABORATORIES

Thomas F. Willer, Ph.D.  
Associate Director, Regulatory Affairs  
Hospital Products Division  
Phone: (847) 937-6845  
Fax: (847) 938-7867  
Internet: WILLETTF@hpd.abbott.com

12-99f.tfw/35

P.4/19

DEC 09 '99 10:46AM D389 REG AFFAIRS (847)938-7867

**CERTIFICATION OF COMPLIANCE**  
**Rocky Mount, North Carolina Facility**

Abbott Laboratories certifies that it is in compliance with, or on an enforceable schedule to be in compliance with, all emission requirements set forth in permits, consent decrees, and administrative orders applicable to solution preparation and filling of Dexmedetomidine Hydrochloride Injection at its facility in Rocky Mount, North Carolina as well as emission requirements set forth in applicable federal, state, and local environmental and occupational exposure statutes and regulations applicable to solution preparation and filling of Dexmedetomidine Hydrochloride Injection at its facility in Rocky Mount, North Carolina.

Signature:

John Robbins

John Robbins  
Principal Environmental Specialist  
Abbott Laboratories,  
Hospital Products Division

Date:

December 9, 1999

APPEARS THIS WAY  
ON ORIGINAL

5



## Memorandum

DATE: November 29, 1999  
FROM: Albinus M. D'Sa, Ph.D. *IS/*  
TO: Cynthia McCormick, M.D.  
SUBJECT: NDA 21-038, CMC review status

I am writing this memo to inform you that currently all CMC issues are resolved and that the NDA from the CMC stand point is recommended for approval.

Previously, our recommendation in the CMC review #1, dated June 30, 1999, was approvable. This was because the Office of Compliance recommendation was pending and the EES indicated that

Upon talking with the compliance officer, Mr. Richard Friedman and the inspector Mr. Thomas Arista, I was informed that the applicant was working on the deficiencies listed in the form-483, as listed by the inspector. All of these issues pertained to Current Good Manufacturing Practice. However, the inspection deficiencies only applied to drug substances that were to be used in manufacturing a drug product via an aseptically filled sterile process. Dexmetomidine HCl, is a terminally sterilized product and therefore the issues in the form-483, did not apply to this particular NDA. The drug product manufacturing facility was found to be acceptable from the CGMP perspective. The office of compliance could not however provide an acceptable recommendation to the EES request because of the pending CGMP issues at the firm.

A consult was initiated (based on an E-mail from Dr. Rappaport) to Microbiology to seek advice on the micro issues that compliance had raised in the form-483; the response is pending. However, in the interim, the firm has complied with all of the CGMP observations, and the Office of Compliance on November 19, 1999, reported an acceptable status for all the facilities in the EES request. Therefore from the CMC standpoint, this application is recommended for approval.

The other issues that needed clarification were as follows, however none of these are approvability issues:

Except for one, all issues raised in the NDA review pertain to labeling. On the one issue, the applicant has tightened the specs for endotoxin. The reviewer was asking for data to support the new specs. At this point this data may not be important because the marketed product will have to meet these new tighter specs.

The applicant has satisfactorily addressed the issues raised in DMF. The stability protocol for the drug substance is modified as requested, and applicant has agreed to perform acceptance testing of every lot of drug substance based on the specifications of the drug substance. The DMF holder will have an expiration date for the drug substance of 3 years, based on the stability data for the drug substance.

And finally, a standard statement should on methods validation should be included in the approval letter, because the FDA labs have not yet completed the validation.

**FOOD and DRUG ADMINISTRATION  
CENTER of DRUG EVALUATION and RESEARCH  
DIVISION OF ANESTHETICS, CRITICAL CARE and ADDICTION DRUG  
PRODUCTS (DACCADP)  
HFD-170**

**NDA:21-038**

CHEMISTRY REVIEW #:1

REVIEW DATE: 30-JUN-99

<u>SUBMISSION TYPE</u>	<u>DOCUMENT DATE</u>	<u>CDER DATE</u>	<u>ASSIGNED DATE</u>
ORIGINAL	18-DEC-98	18-DEC-98	23-DEC-98
AMENDMENT[AC]	09-FEB-99		
AMENDMENT[BC]	30-APR-99	03-MAY-99	

**NAME & ADDRESS OF APPLICANT:**

Abbott Laboratories  
Hospital Products Division  
D-389, Bldg. AP30200  
Abbott Park Road  
Abbott Park, Illinois 60064-3537

Attn: Thomas F. Willer, Ph.D.  
Assistant Director, Regulatory Affairs  
tel.: 874-937-6845

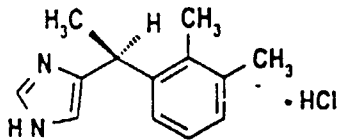
**DRUG PRODUCT NAME**

Proprietary: \_\_\_\_\_  
Nonproprietary/USAN: dexmedetomidine HCl  
Code Name/#:  
Chem.Type/Ther.Class: 1 S

**PHARMACOL.CATEGORY/INDICATION:**

DOSAGE FORM: Injection  
STRENGTHS: 100 µg/mL, 2 mL, in a 2 mL ampoule or vial  
ROUTE OF ADMINISTRATION:  
DISPENSED:  Rx  OTC

**CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR  
FORMULA, MOL.WT:**



(S)-4-[1-(2,3-dimethylphenyl)ethyl]-  
1H-imidazole hydrochloride  
DEXMEDETOMIDINE HYDROCHLORIDE



**CONCLUSIONS & RECOMMENDATIONS:**

- a. No DMF reviews are pending.
- b. The validation of the analytical methods is in progress.
- c. Inspection of the facilities has been completed. ~~\_\_\_\_\_~~ *action*
- d. All chemistry related consult reviews, namely the microbiology and tradename reviews, have been completed.
- e. The comments and deficiencies listed in the Draft Letter must be conveyed to the Applicant. *7*
- f. This application is approvable from the chemistry standpoint pending satisfactory resolution of the issues related ~~\_\_\_\_\_~~

*151*

~~\_\_\_\_\_~~  
 Michael C. Theodorakis, Ph.D.  
 Senior Review Chemist

*151*

~~\_\_\_\_\_~~  
 Albinus M. D'Sa, Ph.D.  
 Chemistry Team Leader

REVIEW FOR HFD-170  
OFFICE OF NEW DRUG CHEMISTRY  
MICROBIOLOGY STAFF  
ADDENDUM TO MICROBIOLOGIST'S REVIEW #1 OF NDA

November 23, 1999

- A. 1. NDA 21-038
- SPONSOR Abbott Laboratories
2. PRODUCT NAMES: ———— Jemedetomidine HCl) for Infusion
3. DOSAGE FORM AND ROUTE OF ADMINISTRATION: Sterile 2 mL vials and 2 mL ampules for infusion
4. METHOD(S) OF STERILIZATION: Terminal moist heat by autoclave. The ampule presentation is aseptically processed before the autoclave cycle.
5. PHARMACOLOGICAL CATEGORY: Sedative
6. DRUG PRIORITY CLASSIFICATION: 1S
- B. 1. DATE OF INITIAL SUBMISSION: December 18, 1998
2. DATE OF AMENDMENT: N/A
3. RELATED DOCUMENTS: Microbiologist's Review #1 dated April 27, 1999, Inspection Report (FDA 483) dated March 6, 1999, and letter from Compliance to  
—————
4. ASSIGNED FOR REVIEW: 11/12/99
- C. REMARKS: The consult request asks for an evaluation of the inspection report of the  
————— The inspection evaluated ————  
aseptic processing of finished small volume sterile solution products, and resulted in findings of cGMP deviations. Consequently, a letter was sent (November 1, 1999) from the FDA's Office of Compliance to notify the firm that it was not in a state of compliance. Microbiologist's Review #1 of the NDA was done by Dr. Patricia Hughes, and recommended approval of the finished product, which is manufactured at Abbott's facility in Rocky Mount, NC. Notes concerning the Investigator's findings, Compliance's
-

recommendation, and the Microbiologist's review are provided in the "Review Notes" that follow.

- D. CONCLUSIONS: The application is recommended for APPROVAL. Additional considerations are discussed in section "E. Review Notes".

ISI  
\_\_\_\_\_  
David Hussong, Ph.D.

11-23-99

HC 11/23/99

**APPEARS THIS WAY  
ON ORIGINAL**

# REQUEST FOR CONSULTATION

TO (Division/Office): HFD-160 (Division of Microbiology), Dr. Peter  
Key, Parklawn Rm 188-08

FROM: HFD-170 (Division of Anesthetic, Critical Care, and Addiction  
Drug Products), Dr. Cynthia McCormick

November 10, 1999	IND NO.	NDA NO. 21-038	TYPE OF DOCUMENT Conclusion of CGMP inspection of <u>Dexmedetomidine</u> facility in	DATE OF DOCUMENT November 1, 1999
NAME OF DRUG Dexmedetomidine		PRIORITY CONSIDERATION High	CLASSIFICATION OF DRUG 1-S	DESIRED COMPLETION DATE ASAP

NAME OF FIRM: Abbott Laboratories

### REASON FOR REQUEST

#### I. GENERAL

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> NEW PROTOCOL                             | <input type="checkbox"/> PRE-NDA MEETING         | <input type="checkbox"/> RESPONSE TO DEFICIENCY LETTER |
| <input type="checkbox"/> PROGRESS REPORT                          | <input type="checkbox"/> END OF PHASE II MEETING | <input type="checkbox"/> FINAL PRINTED LABELING        |
| <input type="checkbox"/> NEW CORRESPONDENCE                       | <input type="checkbox"/> RESUBMISSION            | <input type="checkbox"/> LABELING REVISION             |
| <input type="checkbox"/> DRUG ADVERTISING                         | <input type="checkbox"/> SAFETY/EFFICACY         | <input type="checkbox"/> ORIGINAL NEW CORRESPONDENCE   |
| <input type="checkbox"/> ADVERSE REACTION REPORT                  | <input type="checkbox"/> PAPER NDA               | <input type="checkbox"/> FORMULATIVE REVIEW            |
| <input checked="" type="checkbox"/> MANUFACTURING CHANGE/ADDITION | <input type="checkbox"/> CONTROL SUPPLEMENT      | <input type="checkbox"/> OTHER (SPECIFY BELOW):        |
| <input type="checkbox"/> MEETING PLANNED BY                       |  |  |

#### II. BIOMETRICS

STATISTICAL EVALUATION BRANCH	STATISTICAL APPLICATION BRANCH
<input type="checkbox"/> TYPE A OR B NDA REVIEW <input type="checkbox"/> END OF PHASE II MEETING <input type="checkbox"/> CONTROLLED STUDIES <input type="checkbox"/> PROTOCOL REVIEW <input type="checkbox"/> OTHER (SPECIFY BELOW):	<input type="checkbox"/> CHEMISTRY REVIEW <input type="checkbox"/> PHARMACOLOGY <input type="checkbox"/> BIOPHARMACEUTICS <input type="checkbox"/> OTHER (SPECIFY BELOW):

*TO IS/ 11/12/99*

#### III. BIOPHARMACEUTICS

<input type="checkbox"/> DISSOLUTION <input type="checkbox"/> BIOAVAILABILITY STUDIES <input type="checkbox"/> PHASE IV STUDIES	<input type="checkbox"/> DEFICIENCY LETTER RESPONSE <input type="checkbox"/> PROTOCOL-BIOPHARMACEUTICS <input type="checkbox"/> IN-VIVO WAIVER REQUEST
---	--

#### IV. DRUG EXPERIENCE

<input type="checkbox"/> PHASE IV SURVEILLANCE/EPIDEMIOLOGY PROTOCOL <input type="checkbox"/> DRUG USE e.g. POPULATION EXPOSURE, ASSOCIATED DIAGNOSES <input type="checkbox"/> CASE REPORTS OF SPECIFIC REACTIONS (List below) <input type="checkbox"/> COMPARATIVE RISK ASSESSMENT ON GENERIC DRUG GROUP	<input type="checkbox"/> REVIEW OF MARKETING EXPERIENCE, DRUG USE AND SAFETY <input type="checkbox"/> SUMMARY OF ADVERSE EXPERIENCE <input type="checkbox"/> POISON RICK ANALYSIS
--	---

#### V. SCIENTIFIC INVESTIGATIONS

<input type="checkbox"/> CLINICAL	<input type="checkbox"/> PRECLINICAL
-----------------------------------	--------------------------------------

#### COMMENTS/SPECIAL INSTRUCTIONS:

Please review the microbiology-related conclusions of the cGMP inspection of the facility for manufacturing the bulk drug substance, dexmedetomidine HCl, located in Espoo Finland. It should be noted that the bulk substance is shipped to US and the drug product, dexmedetomidine HCl injection, is manufactured by Abbott Labs and is terminally sterilized. The Abbott Labs facility was found to be acceptable by Compliance. Please indicate whether or not the approvable recommendation of your staff regarding this application is still valid. Please note that the SVT product (NDA 20-038) was not evaluated in this establishment inspection.

If you have any written comments, please provide a copy for Laura Governale, Regulatory Project Manager, HDF-170 and Joan Fuscher

TITLE OF REQUESTER	METHOD OF DELIVERY (Check one) <input type="checkbox"/> MAIL <input checked="" type="checkbox"/> HAND
SIGNATURE OF RECEIVER	SIGNATURE OF DELIVERER

*IS/ 11/10/99*



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE  
FOOD AND DRUG ADMINISTRATION

CENTER FOR DRUG EVALUATION AND RESEARCH

Division of Manufacturing and Product Quality, HFD-320  
7520 Standish Place  
Rockville, Maryland 20855-2737

TELEPHONE: (301) 594-0093  
FAX: (301) 594-2202

NOV 1 1999

Dr. Jyrki Mattila  
President  
Orion Corporation,  
Orion Pharma  
Orionintie 2  
02101 Espoo, Finland

Dear Mr. Mattila:

The Food & Drug Administration has completed its review of the March 1-6, 1999 inspection of your sterile pharmaceutical manufacturing facility in Espoo, Finland. The inspection revealed significant deviations from current good manufacturing practices (CGMP) in the manufacture of sterile pharmaceuticals. The deviations were presented to your attention on an FDA-483 List of Observations at the close of the inspection. The CGMP deviations cause these drug products to be adulterated within the meaning of section 501(a)(2)(B) of the Federal Food, Drug, and Cosmetic Act.

Some notable deficiencies include:

1. No records that equipment was sterilized or disinfected. No record existed for materials/equipment including but not limited to: stopper bowl, stopper bowl plastic cover, RCS microbial sampler, and scissors.

It should be noted that sterilization and sanitization records are fundamental to a sterile drug product manufacturing operation. As part of your response to this issue, please specifically state whether stopper bowls (and associated covers) are sterilized or only disinfected.

2. Lack of reconcilability of vials discarded during the media fill operation.

3. Inadequate studies performed to evaluate laminarity of air in class 100 processing zone.

4. Failure to adequately control computer software used to record and process data for annual reports, complaint handling, raw material weighing, creating

batch record instructions (in some instances), and control/release of goods from raw material through finished stages.

5. A number of instances of failure to maintain either adequate or sufficient records, including validation documentation.

For example, autoclave load configurations and placement of thermocouples in autoclave chamber were not adequately described in SOPs. As another example, your firm did not document which aerosol compound was used for performing integrity tests of HEPA filters in the aseptic processing area.

With regard to computers, we note that there was no record of original system requirements or design. In addition, the previous software version/s/ for significant programs were not retained. Version control should be practiced for software developed by firms for use in any CGMP application.

Within your response to this letter, please provide an update on your firm's progress toward retaining digital data (observations 23-26). The inspection found that many quality control laboratory digital data files were deleted.

6. Change control procedures were inadequate. As an example, significant water system changes (e.g., changes in major piping) were not the subject of increased testing for purposes of revalidation. In addition, when significant systems (e.g., air, water, etc.) undergo modifications, the updated configuration of the system should be promptly and adequately documented.

7. Water for injection (WFI) sampling was inadequate. Some points of use (approximately one-quarter of them) were not sampled, and only three samples were taken per week. Please note that at least one sample should be taken from the WFI system daily, and rotation of sampling to a given WFI takeoff point should generally occur more frequently than monthly (as stated in your FDA 483 response).

Please clarify each of the above items in your response and address your firm's efforts to handle these issues globally. Include a timetable of when corrections will be completed and supporting documents and translations in English. Specifically, we would prefer a *report updating the status of each commitment (e.g., creation or revision of an SOP; performing training)* included in your firm's April 20 and June 4, 1999 responses.

Finally, we would like to clarify one aspect of FDA 483 observation #20 and your associated written response. We consider the person performing the


validation studies to be responsible for the integrity of data generated. However, it is not a specific GMP requirement that the data must be otherwise "evaluated" by this specific individual. "Evaluation" can connote an assessment or interpretation of the data in order to reach a conclusion on process validity. FDA does not require conclusions on the validity of the process to be determined by the same person generating the actual data for the study. This critical responsibility is one which FDA expects to be properly discharged by specified personnel of the firm, including final review and approval by responsible officials of the quality control unit.

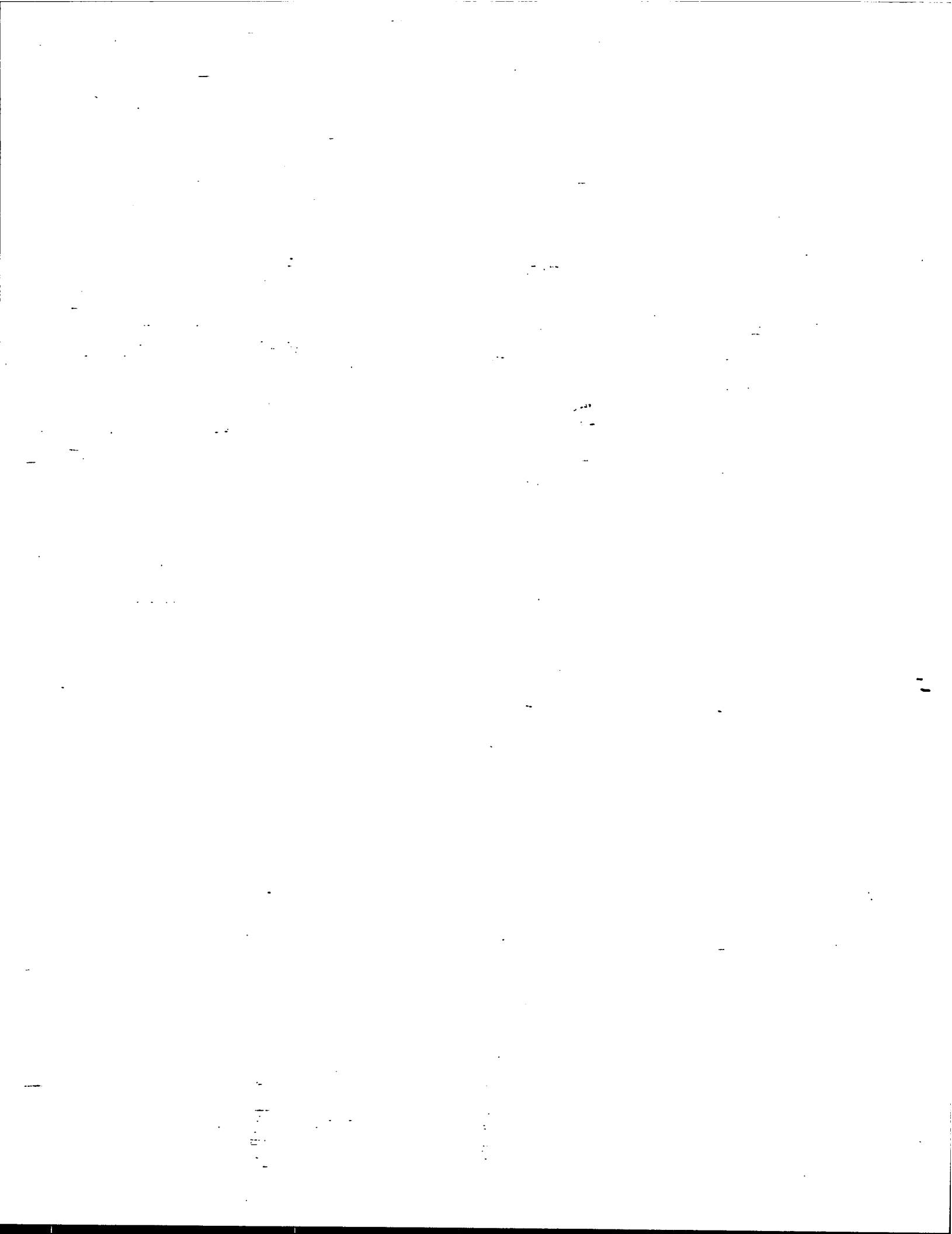
The CGMP deviations identified above are not to be considered an all inclusive list of the deficiencies at your facility. FDA inspections are audits which are not intended to determine all deviations from CGMPs that exist at a firm. We recommend that you continually evaluate the overall CGMP compliance of your facility.

Until FDA has confirmed that your firm is in CGMP compliance we will not recommend approval of any new drug applications for sterile drugs manufactured by this facility.

Please acknowledge your receipt of this letter. Facsimiles may be sent to (301) 827-0145. You may contact me at (301) 594-0095 with any questions.

Sincerely,

  
Richard L. Friedman  
Compliance Officer  
Investigations and Compliance Branch







DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service  
Food and Drug Administration

## Memorandum

**DATE:** December 1, 1999  
**FROM:** Albinus M. D'Sa, Ph.D. *IS/*  
**TO:** NDA file # 21-038  
**SUBJECT:** NDA 21-038, CMC review status

I am writing this memo to document a telcon that occurred yesterday between David Hussong, Ph.D. (Acting Assoc. Director of Microbiology, Acting for Perter Cooney, Ph.D.).

I indicated to Dr. Hussong that the division was concerned and needed clarification on the comment made in the consult review (page 10, fourth paragraph). The review was done by Patrica Hughes, Ph.D., who I was informed no longer works in the Division of Microbiology. The comment related to the aseptic processing prior to the terminal sterilization of the product. The comment stated that this process was not validated and the filters have not been validated for microbial retentivity.

Dr. Hussong, said that the review conclusion are based on the terminal sterilization process and its validation. The lack of information in the aseptic processing such as filter retention is not critical. so this was not a problem that he was concerned about. The filtration step does not have to be validated because the materials are accepted with low bioburden.

I also inquired during the conversation on the status of the inspection consult that chemist had sent to Peter Cooney. He indicated that it was completed and we should have already received it.

**APPEARS THIS WAY  
ON ORIGINAL**

APR 30 1999

REVIEW TO HFD-170  
OFFICE OF NEW DRUG CHEMISTRY  
MICROBIOLOGY TEAM  
MICROBIOLOGIST REVIEW OF A NDA  
27 April 1999

A. NDA 21-038

PRODUCT NAME:            x (dexmedetomidine HCl) for Infusion

APPLICANT: Abbott Laboratories

DOSAGE FORM: Sterile aqueous solution in vials and ampoules for injection;  
List No. 1638, 2 mL vial, 100 µg/mL and List 3434 2 mL ampoule, 100 µg/mL

METHOD OF STERILIZATION: Terminal sterilization by autoclave

PHARMACOLOGICAL CATEGORY: Alpha-2 sedative with analgesic properties for use in an intensive care setting.

B. INITIAL APPLICATION DATE: 18 December 1998

ASSIGNED FOR REVIEW: 11 February 1999

C. REMARKS: A microbiology consult was requested to review the terminal sterilization process and the sterility test information. The drug product is a sterile aqueous solution filled in vials and ampoules. It is intended to be further diluted with 0.9% sodium chloride prior to intravenous infusion.

D. CONCLUSIONS: The NDA 21-038, which provides for            dexmedetomidine HCl) Injection is recommended for approval from the standpoint of product quality microbiology. Please see section E for Review Notes.

*ISI*  
\_\_\_\_\_  
Patricia F. Hughes, Ph. D.  
Review Microbiologist

*JAC 4/30/99*

*20'99*

# REQUEST FOR CONSULTATION

TO (Division/Office):

Medical Imaging and Radiopharmaceutical Drug  
Products Dr. Peter Cooney HFD-160 Rm. 18B-08

FROM: Michael Theodorakis, Reviewing Chemist  
Anesthetic, Critical Care & Addiction Drug Products  
HFD-170 827-7410

DATE  
February 5, 1999

IND NO.

NDA NO.  
21-038

TYPE OF DOCUMENT  
NDA

DATE OF DOCUMENT  
12-18-98

NAME OF DRUG

(dexmedetomidine HCL)  
Injection

PRIORITY CONSIDERATION

Routine

CLASSIFICATION OF DRUG

DESIRED COMPLETION DATE

May 30, 1999

NAME OF FIRM: Abbott Laboratories

### REASON FOR REQUEST

#### I. GENERAL

- NEW PROTOCOL
- PROGRESS REPORT
- NEW CORRESPONDENCE
- DRUG ADVERTISING
- ADVERSE REACTION REPORT
- MANUFACTURING CHANGE/ADDITION
- MEETING PLANNED BY

- PRE-NDA MEETING
- END OF PHASE II MEETING
- RESUBMISSION
- SAFETY/EFFICACY
- PAPER NDA
- CONTROL SUPPLEMENT

- RESPONSE TO DEFICIENCY LETTER
- FINAL PRINTED LABELING
- LABELING REVISION
- ORIGINAL NEW CORRESPONDENCE
- FORMULATIVE REVIEW
- OTHER (SPECIFY BELOW):

*ISJ*  
*PHC*  
*2/1/99*

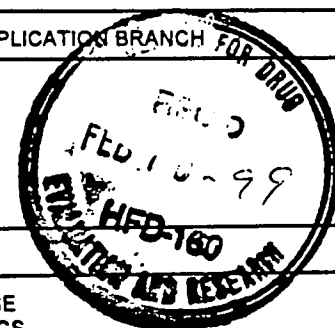
#### II. BIOMETRICS

STATISTICAL EVALUATION BRANCH

- TYPE A OR B NDA REVIEW
- END OF PHASE II MEETING
- CONTROLLED STUDIES
- PROTOCOL REVIEW
- OTHER (SPECIFY BELOW):

STATISTICAL APPLICATION BRANCH FOR DRUG

- CHEMISTRY REVIEW
- PHARMACOLOGY
- BIOPHARMACEUTICS
- OTHER (SPECIFY BELOW):



#### III. BIOPHARMACEUTICS

- DISSOLUTION
- BIOAVAILABILITY STUDIES
- PHASE IV STUDIES

- DEFICIENCY LETTER RESPONSE
- PROTOCOL-BIOPHARMACEUTICS
- IN-VIVO WAIVER REQUEST

#### IV. DRUG EXPERIENCE

- PHASE IV SURVEILLANCE/EPIDEMIOLOGY PROTOCOL
- DRUG USE e.g. POPULATION EXPOSURE, ASSOCIATED DIAGNOSES
- CASE REPORTS OF SPECIFIC REACTIONS (List below)
- COMPARATIVE RISK ASSESSMENT ON GENERIC DRUG GROUP

- REVIEW OF MARKETING EXPERIENCE, DRUG USE AND SAFETY
- SUMMARY OF ADVERSE EXPERIENCE
- POISON RICK ANALYSIS

#### V. SCIENTIFIC INVESTIGATIONS

CLINICAL

PRECLINICAL

COMMENTS/SPECIAL INSTRUCTIONS:

**This is a terminally sterilized small volume injection. Please review the sterilization process and sterility testing information.**

SIGNATURE OF REQUESTER

Michael C. Theodorakis, Ph.D. *ISJ* 2/1/99

METHOD OF DELIVERY (Check one)

MAIL

HAND

SIGNATURE OF RECEIVED

SIGNATURE OF DELIVERER

FDA CDER EES  
ESTABLISHMENT EVALUATION REQUEST  
SUMMARY REPORT

Application: NDA 21038/000  
Stamp: 18-DEC-1998 Regulatory Due: 18-JAN-2000  
Applicant: ABBOTT LABS  
200 ABBOTT PARK RD D389 BLDG A  
ABBOTT PARK, IL 600643537

Priority: 1S  
Action Goal:  
Brand Name: EXMEDETOMIDINE  
HCL)100MCG/ML I  
Established Name:  
Generic Name: DEXMEDETOMIDINE HCL  
Dosage Form: INJ (INJECTION)  
Strength: 100 MCG/ML

Org Code: 170

District Goal: 19-NOV-1999

FDA Contacts: S. SAMANTA (HFD-170) 301-827-7410 , Project Manager  
M. THEODORAKIS (HFD-170) 301-827-7425 , Review Chemist  
A. D SA (HFD-170) 301-827-7443 , Team Leader

Overall Recommendation:

ACCEPTABLE on 19-NOV-1999 by M. EGAS (HFD-322) 301-594-0095

Establishment: 1021343  
ABBOTT LABORATORIES  
HWY 301 NORTH  
ROCKY MOUNT, NC 27804

DMF No:  
AADA No:

Profile: SVT OAI Status: NONE  
Last Milestone: OC RECOMMENDATION  
Milestone Date 20-MAY-1999  
Decision: ACCEPTABLE  
Reason: DISTRICT RECOMMENDATION

Responsibilities: FINISHED DOSAGE  
MANUFACTURER

Establishment: 1411365  
ABBOTT LABORATORIES  
1401 14TH & SHERIDAN ROAD  
NORTH CHICAGO, IL 60064

DMF No:  
AADA No:

Profile: CTL OAI Status: NONE  
Last Milestone: OC RECOMMENDATION  
Milestone Date 03-FEB-1999  
Decision: ACCEPTABLE  
Reason: BASED ON PROFILE

Responsibilities: FINISHED DOSAGE STABILITY  
TESTER

Establishment: 9610102  
ORION CORP LTD  
FERMION KOIVUMANKKAANTIE 6  
ESPOO, , FI

DMF No:  
AADA No:

Profile: CSS OAI Status: NONE  
Last Milestone: OC RECOMMENDATION  
Milestone Date 19-NOV-1999

Responsibilities: DRUG SUBSTANCE  
MANUFACTURER

FDA CDER EES  
ESTABLISHMENT EVALUATION REQUEST  
SUMMARY REPORT

Decision: **ACCEPTABLE**  
Reason: **DISTRICT RECOMMENDATION**

---

**APPEARS THIS WAY  
ON ORIGINAL**

MEMORANDUM -

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
PUBLIC HEALTH SERVICES  
FOOD AND DRUG ADMINISTRATION  
CENTER FOR DRUG EVALUATION AND RESEARCH

Date: June 4, 1999

To: Food and Drug Administration, Pre-approval Laboratories

1<sup>st</sup> Laboratory

Division of Testing and Applied Analytical Development, HFD-920  
1114 Market Street, Room 1002  
St. Louis, MO 63101  
Attention: Harry Coffman

2<sup>nd</sup> Laboratory

Philadelphia District Laboratory, HFR-MA160  
US Customhouse  
2nd and Chestnut Streets, Room 900  
Philadelphia, PA 19106  
Attention: Nicholas Falcone

From: Michael Theodorakis, Ph.D. Senior Review Chemist, HFD-170, *MCT 6/4/99*  
Division of Anesthetic, Critical Care, and Addiction Drug Products, CDER

Through: Albinus D'Sa, Ph.D., Chemistry Team Leader, HFD-170, *MCT for DSA 6/4/99*  
Division of Anesthetic, Critical Care, and Addiction Drug Products, CDER

Subject: Laboratory Assignments for NDA Methods Validation (MV)

NDA No: 21-038

Product:            (dexmedetomidine HCl) Injection

Applicant: Abbott Laboratories,  
200 Abbott Park Road  
Abbott Park, IL 60064-3537  
Attn: Thomas F. Willer, Ph.D., Assistant Director, Regulatory Affairs,  
tel. 847-937-6845

Please find attached an amendment to NDA 21-038 that contains revisions for the following analytical procedures:

- a. 74762 Dexmedetomidine HCl
- b. C-1681 Determination and Identification of Dexmedetomidine and Related Substances in Bulk Drug and Injection.

This amendment should become part of the MV package for NDA 21-038 that was mailed to your labs on March 17, 1999.

Enclosures

cc: Original NDA 21-038  
HFD-170 Division File

**APPEARS THIS WAY  
ON ORIGINAL**

Application Drawer

Application: N 21038/000 Sponsor: ABBOTT LABS

Drug Name: DEXMEDETOMIDINE HCL

Establishment CFN	Establishment Name	Profile Code	Profile Name	Last Milestone Date	Last Compliance Status	Last Compliance Date	OAI Alert
1021343	ABBOTT LABORATORIES	SUT	OC RECOMMENDATION	20-MAY-1999	AC	20-MAY-1999	
1411365	ABBOTT LABORATORIES	CTL	OC RECOMMENDATION	03-FEB-1999	AC	03-FEB-1999	
				999	AC	19-NOV-1999	
			<del>REMOVED - CANCELLED</del>	999	PN	26-SEP-1999	

Overall Compliance:

Date	Recommendation
19-NOV-1999	ACCEPTABLE

Save Close

APPEARS THIS WAY  
ON ORIGINAL



MEMORANDUM

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
PUBLIC HEALTH SERVICES  
FOOD AND DRUG ADMINISTRATION  
CENTER FOR DRUG EVALUATION AND RESEARCH

Date: June 4, 1999

To: Food and Drug Administration, Pre-approval Laboratories

1<sup>st</sup> Laboratory

Division of Testing and Applied Analytical Development, HFD-920  
1114 Market Street, Room 1002  
St. Louis, MO 63101  
Attention: Harry Coffman

2<sup>nd</sup> Laboratory


Philadelphia District Laboratory, HFR-MA160  
US Customhouse  
2nd and Chestnut Streets, Room 900  
Philadelphia, PA 19106  
Attention: Nicholas Falcone

From: Michael Theodorakis, Ph.D. Senior Review Chemist, HFD-170, *MCT 6/4/99*  
Division of Anesthetic, Critical Care, and Addiction Drug Products, CDER

Through: Albinus D'Sa, Ph.D., Chemistry Team Leader, HFD-170, *MCT for DSA 6/4/99*  
Division of Anesthetic, Critical Care, and Addiction Drug Products, CDER

Subject: Laboratory Assignments for NDA Methods Validation (MV)

NDA No: 21-038

Product:  (dexmedetomidine HCl) Injection

Applicant: Abbott Laboratories,  
200 Abbott Park Road  
Abbott Park, IL 60064-3537  
Attn: Thomas F. Willer, Ph.D., Assistant Director, Regulatory Affairs,  
tel. 847-937-6845

Please find attached an amendment to NDA 21-038 that contains revisions for the following analytical procedures:

- a. 74762 Dexmedetomidine HCl
- b. C-1681 Determination and Identification of Dexmedetomidine and Related Substances in Bulk Drug and Injection.

This amendment should become part of the MV package for NDA 21-038 that was mailed to your labs on March 17, 1999.

Enclosures

cc: Original NDA 21-038  
HFD-170 Division File

**APPEARS THIS WAY  
ON ORIGINAL**