CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:

ANDA 62-756/S-004

Name: Primaxin ADD-Vantage
(Imipenem-Cilastatin Sodium for Injection)

Sponsor: Merck Sharp & Dohme Research Laboratories

Approval Date: February 26, 1991

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APPLICATION NUMBER:

ANDA 62-756/S-004

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APPLICATION NUMBER:

ANDA 62-756/S-004

APPROVAL LETTER

FEB 26 1991

AADA 62-756/S-004

Merck Sharp & Dohme Research Laboratories
Attn: Kenneth R. Brown, M.D., Reg. Affairs
Sumneytown Pike
West Point, PA 19486

Dear Sir:

Reference is made to your supplemental antibiotic drug application submitted pursuant to Section 314.70 of the Regulations, dated February 15, 1990 , regarding your abbreviated antibiotic application for Primaxin® ADD-Vantage® (Imipenem-Cilastatin Sodium, MSD).

The supplemental application provides for correction of the drug product overage for the ADD-Vantage vial.

We have completed the review of this supplemental application and it is approved. Our letter of January 8, 1987 detailed the conditions relating to the approval of this abbreviated application.

The material submitted is being retained as part of your application.

Sincerely yours,

R K Estes, for 2/25/91

Acting Director
Division of Chemistry II
Office of Generic Drugs
Center for Drug Evaluation and Research

cc: AADA# 62-756/S-004
DUP/Division File
HFD-600/RF
HFD-635/RF
HFD-635/JHarrison/EDuffy/ 2/20/91 E. Duffy 2/21/91
HFD-635/JHannan JHannan 2/21/91
R/D initialed by JHarrison
mw/2/21/91/62-756S.004
F/T by mw/2/21/91 2/21/91
SUPPLEMENT APPROVAL

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

ANDA 62-756/S-004

CHEMISTRY REVIEW

AADA 62-756/S-004

NAME AND ADDRESS OF APPLICANT:
Merck Sharp & Dohme Research Laboratories
Attn: Kenneth R. Brown, M.D.
Group Director
Regulatory Affairs, Biologics
Sumneytown Pike
West Point, PA 19486
(215) 834-2552
Contact: David W. Blois, Ph.D.
(215) 834-2304

FEB 21 1991

PURPOSE OF AMENDMENT/SUPPLEMENT
The supplemental application provides for correction of the drug product overage for the ADD-Vantage vial.

DATE(S) OF SUBMISSION(S)
2/15/90

PHARMACOLOGICAL CATEGORY
Antibiotic

TRADE NAME
Primaxin® ADD-Vantage®

NONPROPRIETARY NAME
Imipenem-Cilastatin Sodium

DOSAGE FORM POTENCY RX OR OTC

SAMPLES RELATED IND/NDA/DMF STERILIZATION

LABELING

BIOEQUIVALENCY STATUS

ESTABLISHMENT INSPECTION

COMPONENTS, COMPOSITION, MANUFACTURING, CONTROLS

PACKAGING

STABILITY

REMARKS AND CONCLUSION
Recommend Approval

This supplement corrects the drug product overage of —— as approved, to ——as is actually employed, and which was the qty used in the stability batches. The —— overage was agreed to by the Agency at the time of approval, and was to be corrected by supplement.

RECALLS

Reviewer
Eric P. Duffy

Date Completed

cc: AADA # 62-956/S-004
Review Chemist's name: Eric P. Duffy E. Duffy 2/21/91
Supervisor's name: John D. Harrison
62-956S.004
J. Harrison 2/21/91

APPEARS THIS WAY
ON ORIGINAL

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

ANDA 62-756/S-004

CORRESPONDENCE

5-004 ✓

MERCK SHARP & DOHME RESEARCH LABORATORIES
DIVISION OF MERCK & CO., INC.
WEST POINT, PENNSYLVANIA 19486

KENNETH R. BROWN, M.D.
GROUP DIRECTOR
REGULATORY AFFAIRS BIOLOGICS

(215) 834-2552
(215) 661-5000

February 15, 1990

Mr. John D. Harrison, Chief
Antibiotic Drug Review Branch, HFD-235
Division of Generic Drugs
Office of Drug Standards
Center for Drug Evaluation and Research
Food and Drug Administration
5600 Fishers Lane
Rockville, Maryland 20857

Dear Mr. Harrison:

Supplemental Abbreviated Antibiotic Application: ANDA 62-756
Primaxin® ADD-Vantage® (Imipenem-Cilastatin Sodium, MSD)

Pursuant to Section 505(b) of the Food Drug and Cosmetic Act and, in accordance with 21 CFR 314.50 and 21 CFR 314.70(b), we submit, for your approval, a supplement to ANDA 62-756.

As indicated on the attached Form FDA 356h, this supplemental application provides for changes in Item 3 of the approved Abbreviated Antibiotic Application for Primaxin® ADD-Vantage® and is being submitted subsequent to a telephone conversation with Mr. John Harrison and myself on February 13, 1990. During that conversation we discussed the amount of ingredient overage originally proposed for the product.

In our original August 19, 1986 application we supplied supporting stability data for the product containing —— overage. We proposed to reduce that overage to —— since the ADD-Vantage® system would theoretically eliminate problems with product adhesion to vial walls and components which are experienced with regular vial constitution and withdrawal techniques. The Agency approved the original application and the —— overage on January 8, 1987.

While the Agency was reviewing the original application, we determined that the —— overage originally proposed for elimination was indeed necessary due to material which remains in the ADD-Vantage® system following administration. We discussed the subject with Mr. Harrison on or about December 9, 1986 and informed the Agency that we would retain the —— overage for the product. It was agreed that Merck would submit a supplemental application providing for continued use of the —— overage following approval of the original application.

JUL 7162

ORIGINAL

Although we regret the delay in forwarding such a submission, we have enclosed comparative statements of composition outlining both the originally approved and actual composition. We wish to point out that all lots manufactured and distributed since inception of the product have incorporated the — overage. The change to a —— overage was never implemented. Accordingly, all stability data provided to the Agency prior to or since approval of the product were developed on market package samples containing the — overage. Retention of the — overage also maintains the identical composition of the regular PRIMAXIN product.

We apologize for any inconvenience this situation may have caused.

We consider the filing of this Supplemental Abbreviated Antibiotic Application to be a confidential matter, and request the Food and Drug Administration not to make its content, nor any future communications in regard to it, public without first obtaining the written permission of Merck & Co., Inc.

Questions concerning this supplemental application should be directed to Kenneth R. Brown, M.D. (215/834-2552) or, in his absence, to David W. Blois, Ph.D. (215/834-2304).

Sincerely yours,

Donnie Feldmann for

Kenneth R. Brown, M.D.
Group Director
Regulatory Affairs, Biologics

'L/cat
371H

:tachments

rtified No. P 529 431 715

INAL