

From: Thompson, Edward
Sent: Monday, October 07, 2013 10:48 AM
To: 'Jennifer Spinella (jspinella@raretx.com)'
Cc: Waites, Nancy; Kennedy, Michael
Subject: Information Request for BL 125488/0

Contacts: Jennifer Spinella

Dear Ms. Spinella:

We are reviewing your March 16, 2013 biologics license application (BLA) for Crotalidae (pit viper) Immune F(ab')₂ (Equine) Injection. We are providing the following comments and request for additional information to continue our review:

Drug Product

1. Please provide the completed batch production record for the visual inspection and packaging and labeling of the vials for the conformance lots manufactured.
2. The information in Section 3.2.P.3.5.1 – Media Fills is incomplete. I reviewed the BPR for the 20 mL vial media fill and found it to be incomplete in the following areas:
 - a. The Spanish version of the BPR (the executed BPR) is different from the English translation of the BPR used for the media fill. The Spanish version includes information on incubation conditions and time of incubation for the vials in addition to information on growth promotion testing. The Spanish version documented four “observations / non-conformance”; however it is unclear if these observations were noted in the application. All translations must be true and accurate. Please translate the sections of the executed media fill BPR that are not currently translated and please translate the four “observations / non-conformance” statements.
 - b. Please provide the results from environmental monitoring for rooms and personnel that occurred during the media fill.
 - c. Please provide the total number of hours the lyophilization cycle was simulated. From the Spanish BPR it appears the cycle was simulated for (b) (4). Please confirm.
3. The dates of (b) (4) media lots (b) (4) were provided in the application. Please provide the dates the media were actually used in the media fill and the total number of (b) (4) held from (b) (4) (b) (4) to use in the media fill in (b) (4).
4. For Section 3.2.P.7.3, Container Closure Integrity Testing, please provide the following information:

a. Please clarify if the test vials and the control vials used in this testing protocol were stoppered and crimped using the (b) (4) equipment used in (b) (4) or the (b) (4) process used in Tlalpan.

b. Please clarify the following for the testing protocol:

i. (b) (4)

5. For the report for (b) (4) Water System, (b) (4) (PQ), I was unable to locate the (b) (4) sampling results for Phase 3 Qualification of the (b) (4) system. Please indicate the location of the information within the application or please submit a summary of the results including a summary of any deviations and investigations. In addition, please provide the dates the Phase 3 qualification occurred.

The review of this submission is on-going and issues may be added, expanded upon, or modified as we continue to review this submission.

Please submit your response to this information request as an amendment to this file by October 28, 2013 referencing the date of this request. If you anticipate you will not be able to respond by this date, please contact the Agency immediately so a new response date can be identified.

If we determine that your response to this information request constitutes a major amendment, we will notify you in writing.

The action due date for this file is March 18, 2014.

Please send an email message acknowledging receipt of this request.

If you have any questions, please contact me at (301) 827-9167.

Sincerely,

Edward Thompson

Regulatory Project Manager
FDA/CBER/OBRR/DBA/RPMB

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