

From: Sista, Ramani V  
Sent: Thursday, March 12, 2015 11:26 AM  
To: 'Heather Pratt'  
Subject: RE: Macopharma NDA 125552-Responses to FDA Comments - Email 1 of 5

Importance: High

Hi Heather,  
Thank you for the information.

I am following up regarding the IRs below:

1. During the September 22, 2014 telecon, you stated that you will submit information on the (b) (4) failed sensors during your maximum load validation for your autoclaves and indicated that you were planning new runs by the end of October. Per amendment 2, for NDA125552 dated October 09, 2014, you indicated that the report with the results for the retesting of the sensors will be completed during the week of 27 October 2014 and committed to submitting a copy of the report at the time of completion. The report included in email 3 of 5 sent via email on March 6, 2015, is

for failed sensors for the minimum load. Please submit the report for the maximum load validation.

2. We sent an IR request on February 17, with a response date of COB March 2, for the following:

1. Since you are claiming that the exterior surface of the unit is sterile, please address the following concerns regarding your (b) (4) (i.e. (b) (4)) that you produce in house:

a. Please clarify how you ensure the (b) (4) materials allows for steam penetration. To address this concern, we recommend that you provide the labeling from the (b) (4) manufacturer which indicates that material is intended to be used as a sterile barrier for steam sterilization. If the (b) (4) material is not indicated as a sterile barrier by the manufacturer, then additional testing information should be provided to support this intended use. This information can include:

i. Physical properties testing such as tensile strength, thickness variation, tear resistance, air permanence, burst strength, etc. before and after sterilization. This information should be compared to known sterile barrier (b) (4) materials to ensure adequacy.

ii. Alternatively biological indicator testing (b) (4)

b. Provides a sterile integral barrier over the duration of shelf. This additional testing should include:

i. Description of sealing process and validated sealing parameters.

ii. Whole package integrity testing such as dye penetration or bubble testing following shipping stress.

iii. Accelerated aging to support shelf life claim.

Please acknowledge receipt and submit this requested information by COB, Thursday, March 19.

Thanks,  
Ramani

Ramani Sista, PhD, RAC, CQA  
RPM

OCTGT/CBER/FDA

Phone: 240 402 8354

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE PARTY TO WHOM IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, AND PROTECTED FROM DISCLOSURE UNDER LAW. If you are not the addressee, or a person authorized to deliver

the document to the addressee, you are hereby notified that any review, disclosure, dissemination, copying, or other action based on the content of this communication is not

authorized. If you have received this document in error, please immediately notify the sender

immediately by e-mail or phone.

From: Heather Pratt [mailto:heather@macopharmausa.com]

Sent: Friday, March 06, 2015 4:40 PM

To: Sista, Ramani V

Subject: Macopharma NDA 125552-Responses to FDA Comments - Email 1 of 5

Dear Ramani,

Please find below the responses to the following FDA comments:

Please Note: Due to the size of the attachments, I will be need to send 5 emails.

1. Response to information related to Amendment 2, dated October 9, 2014 – Sent January 22, 2015

Re: Minimum Load Validation and Retest of Sensors

MacoProductions Response 1:

Please find attached Minimum Load Validation Protocols and Reports for Autoclaves

(b) (4)

In addition, a further retest of the sensors was performed on 24 February 2015. The completed report (03 March 2015) and protocol (24 February 2015) for the retest of the sensors is also attached.

\* Attachments:

\* Protocol MSC1207DD Minimum Loading (b) (4)

\* Report MSC1207DD Minimum Loading (b) (4) with Attachments

\* Protocol MSC1207DD Minimum Loading (b) (4)

\* Report MSC1207DD Minimum Loading (b) (4) with Attachments

\* Retest of Sensors MSC1207DD\_Report and Protocol

2. Please provide your sterility testing results for the (b) (4) and product.

MacoProductions Response 2:

Response: The sterility testing results are located in the Stability Testing Intermediate 12 Month

Reports that were included in the 22 April 2014 NDA Original filing. [Volume 4-Module 3, Quality Drug

Product (Volume 2 of 2, pages 260 - 429)] (See report attached).

\* Attachment

\* Stability Study Intermediate Report 12 Months

3. Please provide your test method and qualification/validation for sterility testing of the (b) (4)

In addition, please include (b) (4) results for inoculums used in the qualification of sterility testing of the (b) (4)

MacoProductions Response 3:

Please find attached a copy of the Sterility Test Method (Document No. 104381) that is currently being

validated. The validation requires three (3) runs. One (1) run has been successfully completed. The other two (2) runs are in progress. A complete report will be forwarded upon completion.

- \* Attachment
- \* Sterility Test – Document No. 104381

MacoProductions has decided not to pursue a face-to-face meeting with FDA. Therefore, kindly remove that item from the list.

We are working to complete the final remaining item regarding the (b) (4) and hope to have the response completed within the next week.

Thanks for your patience and consideration.  
Heather

Documents Attached:

- \* Protocol MSC1207DD Minimum Loading (b) (4)
- \* Report MSC1207DD Minimum Loading (b) (4) with Attachments

Best Regards,

Heather Pratt

Listen • Understand  
• Provide Solutions

Heather Pratt  
Manager, Regulatory & Clinical  
Affairs  
heather@macopharmausa.com

3675 Crestwood Pkwy  
Suite 260  
Duluth, GA 30096  
Main: 770-270-6867 x102  
Cell: 404-428-1663  
Fax: 770-496-9835