7400 West 110th Street, Suite 300 Overland Park, Kansas 66210 913.451.3955 tel 913.451.3846 fax



1617 7 My 22 MG 23

a Cardinal Health company

January 19, 2007

Food and Drug Administration Division of Dockets Management Department of Health and Human Services Room 1061 (HFA-305) 5630 Fishers Lane Rockville, MD 20852

Re: Supplement to 1-mL 0.9% Sodium Chloride Injection, *USP*, Suitability Petition, Docket No. 2006P-0302/CPI

Supplement to Suitability Petition, Docket No. 2006P-0302/CPI

Reference is made to 1-mL 0.9% Sodium Chloride Injection, *USP*, Suitability Petition, submitted on July 28, 2006, by Beckloff Associates, Inc. (BAI), and subsequently assigned Docket No. 2006P-0302/CPI. Reference is also made to the discussion between Ms. Cecelia Parise, Office of Generic Drugs, and Mr. Wayne Vallee, BAI, on September 29, 2006, regarding the petition.

Ms. Parise asked for a list of drugs that the 1-mL 0.9% Sodium Chloride Injection, *USP*, could be used with as a diluent. She also indicated that the labeling provided in the petition was for Application No. 018803, which was not a reference listed drug (RLD) at that time. Application No. 018803 is now an RLD.

A. Action Requested

The petitioner requests that the Commissioner of FDA declare that 0.9% Sodium Chloride Injection, *USP*, in a 1-mL prefilled syringe, is suitable for submission as an ANDA. The RLD product upon which this petition is based is 0.9% Sodium Chloride Injection, *USP*, approved in 10-, 20-, and 50-mL dosage strengths in plastic containers, under NDA No. 18-803. Hospira Inc. is the applicant holder of this RLD product. Refer to United Sates Food and Drug Administration, Electronic Orange Book entry for sodium chloride in plastic container (accessed on January 9, 2007) provided in Attachment 1. This petition is submitted for a change in dosage strength (volume) from the RLD product. Sodium Chloride Injection, *USP*, will be marketed in the dosage strength of 1 mL in prefilled syringes. The active ingredient, the route of administration, and the recommendations for use are the same as those of the RLD product. The proposed product will differ only in dosage strength (volume) from the Sodium Chloride Injection, *USP*, marketed product.

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Food and Drug Administration

Re: Supplement to Suitability Petition Docket No. 2006P-0302/CPI

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In response to C. Parise's question regarding compatible products, Attachment 2 provides a partial listing of commercially available products with which a 1-mL volume of 0.9% Sodium Chloride Injection, *USP*, could be used as a diluent.

All other aspects of the original petition remain the same.

F. Certification

The undersigned certifies that to the best of his knowledge, this petition includes all information and views on which the petition relies and that it includes representative data and information known to the petitioner which are unfavorable to the petition.

Sincerely,

Michael C. Beckloff

President

Beckloff Associates, Inc.

7400 West 110th Street, Suite 300

Overland Park, KS 66210

913-451-3955

ffw

ecc: C. Parise; FDA

Attachment 1 Electronic Orange Book Entry

Search results from the "OB_Rx" table for query on "018803."

Active Ingredient:

SODIUM CHLORIDE

Dosage Form; Route:

INJECTABLE; INJECTION SODIUM CHLORIDE 0.9% IN PLASTIC CONTAINER

Proprietary Name: Applicant:

HOSPIRA

Strength:

9MG/ML

Application Number:

018803

Product Number:

001

Approval Date:

Oct 29, 1982

Reference Listed Drug

Yes

RX/OTC/DISCN:

RX

TE Code:

AP

Patent and Exclusivity Info for this product: View

Return to Electronic Orange Book Home Page

FDA/Center for Drug Evaluation and Research

Office of Generic Drugs

Division of Labeling and Program Support

Update Frequency:

Orange Book Data - Monthly

Generic Drug Product Information & Patent Information - Daily

Orange Book Data Updated Through November, 2006

Patent and Generic Drug Product Data Last Updated: January 09, 2007

Attachment 2

Partial Listing of Commercially Available Products That Could Be Reconstituted With a Prefilled Syringe of 1-mL 0.9% Sodium Chloride

Product Name	Pharmaceutical Form	Active Ingredient	Diluent Required
REFLUDAN® (Berlex)	Freeze-dried powder for injection or infusion	Lepirudin (rDNA)	Reconstitute one vial (50 mg of lepirudin) with 1 mL of WFI or Sodium Chloride 0.9% Injection. The final concentration of 5 mg/mL is obtained by transferring the contents of the vial into a sterile, single-use syringe (of at least 10-mL capacity) and diluting the solution to a total volume of 10 mL using WFI or Sodium Chloride 0.9% or Dextrose 5%.
BOTOX® (Allergan)	Powder for injection	Vacuum-dried clostridium botulinum type A neurotoxin complex	Prior to injection, reconstitute vacuum-dried BOTOX with sterile normal saline without a preservative; 0.9% Sodium Chloride Injection with the following dilutions: 1 mL (10 units), 2 mL (5 units), 4 mL (2.5 units), and 8 mL (1.25 units).
ROCEPHIN® (Roche)	Powder for injection and infusion	Ceftriaxone sodium	IM use: Reconstitute Rocephin powder with the appropriate diluent (includes Sodium Chloride 0.9%): 0.9 mL (250-mg vial), 1.8 or 1.0 mL (500-mg vial), 3.6 or 2.1 mL (1-g vial), and 7.2 or 4.2 mL (2-g vial).
INDOCIN®	Lyophilized powder for injection	Indomethacin for injection	The solution should be prepared <u>only</u> with 1 to 2 mL of sterile Sodium Chloride Injection 0.9% or WFI.
BLENOXANE®	Powder for solution for injection	Bleomycin sulphate	The Blenoxane 15-unit vial should be reconstituted with 1 to 5 mL of Sterile WFI, <i>USP</i> ; Sodium Chloride for Injection, 0.9%, <i>USP</i> ; or Sterile Bacteriostatic WFI, <i>USP</i> .