

BPL BLA 125506 Filing Letter.txt

From: Melhem, Randa  
Sent: Friday, August 30, 2013 12:35 PM  
To: Rana, Prati bha  
Cc: Ovanesov, Mikhail V.; Michaelis, Marion; Lee, Timothy  
Subject: BPL BLA 125506 Filing Letter

Hi Prati bha,

The original BLA submission provided an overview, and lacked in details to allow for a proper evaluation of the facility, equipment and processes. On August 8, we had a telecon with the sponsor and requested additional information. The responses that were submitted on August 23, also lacked details in many cases.

Please include in the filing letter that the following information is required to complete the review.

Please provide the following completed validation studies, including protocols and report summaries (data) for our review:

\* Lyophilizers (b) (4): studies and results to support the lyophilization of factor X in the lyophilizers including sampling plan (samples collected from every shelf) and results of testing performed to demonstrate consistent lyophilization of Factor X throughout all the shelves of every lyophilizer.

\* Environmental Monitoring Performance Qualification of the formulation/filling/lyophilization and capping areas under static and dynamic conditions

\* Cleaning of product contact equipment for factor X and WFI diluent: (b) (4)

\* Cleaning and sterilization of the lyophilizers.

\* (b) (4) Autoclave (b) (4) validation studies to support its use for terminal sterilization of WFI diluent.

\* Vial washer and depyrogenation tunnel: studies performed, acceptance criteria, and results to demonstrate the validation of the cleaning and depyrogenation for Factor X 10mL molded tubes, and WFI 5mL tube drawn vials.

\* Visual Inspection: Qualification of the 100% visual inspection; description of the critical, major and minor defects, and the acceptance criteria for the batch to be considered as passing visual inspection, and the conditions under which a second and third visual inspection is allowed.

\* AQL testing and the acceptance criteria for a batch to be considered as passing.

We are providing the above comments to give you preliminary notice of potential review issues.

Our filing review is only a preliminary evaluation of the application and is not indicative of deficiencies that may be identified during our complete review. Issues may be added, deleted, expanded upon, or modified as we review the application. If you respond to these issues during

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this review cycle, we may not consider your response before we take an action on your application. Following a review of the application, we shall advise you in writing of any action we have taken and request additional information if needed.

Thank you,

Randa  
Randa Melhem, Ph. D.  
Consumer Safety Officer  
FDA/CBER/OCBQ/DMPQ  
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