DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 18-035/S-024 **APPROVAL LETTER**

Draximage, a division of Draxis Specialty Pharmaceuticals, Inc.
c/o Kendle International Inc.
Attention: Charles Vachon, M.Sc., MBA
Director, Regulatory Affairs
7361 Calhoun Place, Suite 500
Rockville, MD 20855-2765

Dear Mr. Vachon:

Please refer to your supplemental new drug application (sNDA) dated June 27, 2008, received July 1, 2008, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Draximage® MDP-25 (kit for the preparation of technetium Tc 99m medronate injection).

We acknowledge receipt of your submission dated December 2, 2008.

Your submission of December 2, 2008, constituted a complete response to our November 5, 2008, action letter.

This supplemental new drug application proposes a new formulation of the currently approved Draximage® MDP-25. The new formulation contains the same ingredients as in the currently approved Draximage® MDP-25 product with the following changes:

1. Change in mass of stannous chloride dehydrate from 0.8 mg to 2.0 mg
2. Change in mass of max. tin as stannous chloride dehydrate from 1.2 mg to 3.0 mg
3. Change in mass of p-aminobenzoic acid from 2 mg to 5 mg
4. Change in pH range from “6.5 to 7.5” to “6.8 to 6.9”

We completed our review of this application, as amended. This application is approved, effective on the date of this letter, for use as recommended in the agreed-upon labeling text and with the minor editorial revisions indicated in the enclosed labeling.

The final printed labeling (FPL) must be identical to the submitted labeling (package insert, immediate container and carton labels submitted December 2, 2008). These revisions are terms of the approval of this application.

Please submit an electronic version of the FPL according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format - NDA*. Alternatively, you may submit 20 paper copies of the FPL as soon as it is available but no more than 30 days after it is printed.

Individually mount 15 of the copies on heavy-weight paper or similar material. For administrative purposes, designate this submission "**FPL for approved supplement NDA 18-035/S-024, SCF**." Approval of this submission by FDA is not required before the labeling is used.

In addition, submit three copies of the introductory promotional materials that you propose to use for this product. Submit all proposed materials in draft or mock-up form, not final print. Send one copy to the Division of Medical Imaging and Hematology Products and two copies of both the promotional materials and the package insert directly to:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Drug Marketing, Advertising, and Communications
5901-B Ammendale Road
Beltsville, MD 20705-1266

If you issue a letter communicating important information about this drug product (i.e., a "Dear Health Care Professional" letter), we request that you submit a copy of the letter to this NDA and a copy to the following address:

MEDWATCH
Food and Drug Administration
Suite 12B05
5600 Fishers Lane
Rockville, MD 20857

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

If you have any questions, call Frank Lutterodt, Regulatory Project Manager, at (301) 796-4251.

Sincerely,

{See appended electronic signature page}

Rafel Dwaine Rieves, M.D.
Director
Division of Medical Imaging and Hematology Products
Office of Oncology Drug Products
Center for Drug Evaluation and Research

Enclosure: Draft Labeling

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

Rafel Rieves

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