

CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:

125554Orig1s004

Trade Name: OPDIVO

Generic or Proper Name: nivolumab

Sponsor: Bristol-Myers Squibb Company

Approval Date: April 14, 2015

Indication: OPDIVO is a human programmed death receptor-1 (PD-1) blocking antibody indicated for the treatment of patients with unresectable or metastatic melanoma and disease progression following ipilimumab and, if BRAF V600 mutation positive, a BRAF inhibitor.

This indication is approved under accelerated approval based on tumor response rate and durability of response. Continued approval for this indication may be contingent upon verification and description of clinical benefit in the confirmatory trials.

CENTER FOR DRUG EVALUATION AND RESEARCH

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**CENTER FOR DRUG EVALUATION AND
RESEARCH**

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APPROVAL LETTER



DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

BLA 125554/004

APPROVAL LETTER

Bristol-Myers Squibb Company
Attention: Ramji Krishan, Ph.D.
Associate Director, CMC Biologics
P.O. Box 4000
Princeton, NJ 08543-4000

Dear Dr. Krishnan:

Your request to supplement your biologics license application submitted under section 351(a) of the Public Health Service Act for Opdivo® (nivolumab) to include a comparability protocol to support the qualification of a new working cell bank for manufacture of nivolumab drug substance, has been approved.

We acknowledge your written commitment as described in your letter of July 27, 2015, as outlined below:

2941-1 To evaluate each subclonal population in the master cell bank with respect to performance and product quality. Final Report Submission: January, 2016

This information will be included in your biologics license application file.

If you have any questions, please contact Anita Brown, Regulatory Business Process Manager, at (301) 796-2066 or Anita.Brown@fda.hhs.gov.

Sincerely,

David M. Frucht -S

Digitally signed by David M. Frucht -S
DN: c=US, o=U.S. Government, ou=HHS, ou=FDA, ou=People, 0.9.2342.19200300.100.1.1=1300
168694, cn=David M. Frucht -S
Date: 2015.08.14 11:42:41 -04'00'

David Frucht, M.D.
Director (Acting)
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Center for Drug Evaluation and Research

**CENTER FOR DRUG EVALUATION AND
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LABELING

HIGHLIGHTS OF PRESCRIBING INFORMATION

These highlights do not include all the information needed to use OPDIVO safely and effectively. See full prescribing information for OPDIVO.

OPDIVO (nivolumab) injection, for intravenous use
Initial U.S. Approval: 2014

-----INDICATIONS AND USAGE-----

OPDIVO is a human programmed death receptor-1 (PD-1) blocking antibody indicated for the treatment of patients with unresectable or metastatic melanoma and disease progression following ipilimumab and, if BRAF V600 mutation positive, a BRAF inhibitor.

This indication is approved under accelerated approval based on tumor response rate and durability of response. Continued approval for this indication may be contingent upon verification and description of clinical benefit in the confirmatory trials. (1, 14)

-----DOSAGE AND ADMINISTRATION-----

Administer 3 mg/kg as an intravenous infusion over 60 minutes every 2 weeks. (2.1)

-----DOSAGE FORMS AND STRENGTHS-----

Injection: 40 mg/4 mL and 100 mg/10 mL solution in a single-use vial (3)

-----CONTRAINDICATIONS-----

None. (4)

-----WARNINGS AND PRECAUTIONS-----

Immune-mediated adverse reactions: Administer corticosteroids based on the severity of the reaction. (5.1, 5.2, 5.3, 5.4, 5.6)

- Immune-mediated pneumonitis: Withhold for moderate and permanently discontinue for severe or life-threatening pneumonitis. (5.1)
- Immune-mediated colitis: Withhold for moderate or severe and permanently discontinue for life-threatening colitis. (5.2)
- Immune-mediated hepatitis: Monitor for changes in liver function. Withhold for moderate and permanently discontinue for severe or life-threatening transaminase or total bilirubin elevation. (5.3)
- Immune-mediated nephritis and renal dysfunction: Monitor for changes in renal function. Withhold for moderate and permanently discontinue for severe or life-threatening serum creatinine elevation. (5.4)
- Immune-mediated hypothyroidism and hyperthyroidism: Monitor for changes in thyroid function. Initiate thyroid hormone replacement as needed. (5.5)
- Embryofetal toxicity: Can cause fetal harm. Advise of potential risk to a fetus and use of effective contraception. (5.7, 8.1, 8.3)

-----ADVERSE REACTIONS-----

Most common adverse reaction ($\geq 20\%$) was rash. (6.1)

To report SUSPECTED ADVERSE REACTIONS, contact Bristol-Myers Squibb at 1-800-721-5072 or FDA at 1-800-FDA-1088 or www.fda.gov/medwatch.

-----USE IN SPECIFIC POPULATIONS-----

- Lactation: Discontinue breastfeeding. (8.2)

See 17 for PATIENT COUNSELING INFORMATION and Medication Guide.

Revised: 12/2014

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FULL PRESCRIBING INFORMATION

1 INDICATIONS AND USAGE

OPDIVO[®] (nivolumab) is indicated for the treatment of patients with unresectable or metastatic melanoma and disease progression following ipilimumab and, if BRAF V600 mutation positive, a BRAF inhibitor [see *Clinical Studies (14)*].

This indication is approved under accelerated approval based on tumor response rate and durability of response. Continued approval for this indication may be contingent upon verification and description of clinical benefit in the confirmatory trials.

2 DOSAGE AND ADMINISTRATION

2.1 Recommended Dosage

The recommended dose of OPDIVO is 3 mg/kg administered as an intravenous infusion over 60 minutes every 2 weeks until disease progression or unacceptable toxicity.

2.2 Dose Modifications

There are no recommended dose modifications for hypothyroidism or hyperthyroidism.

Withhold OPDIVO for any of the following:

- Grade 2 pneumonitis [see *Warnings and Precautions (5.1)*]
- Grade 2 or 3 colitis [see *Warnings and Precautions (5.2)*]
- Aspartate aminotransferase (AST) or alanine aminotransferase (ALT) greater than 3 and up to 5 times upper limit of normal (ULN) or total bilirubin greater than 1.5 and up to 3 times ULN [see *Warnings and Precautions (5.3)*]
- Creatinine greater than 1.5 and up to 6 times ULN or greater than 1.5 times baseline [see *Warnings and Precautions (5.4)*]
- Any other severe or Grade 3 treatment-related adverse reactions [see *Warnings and Precautions (5.6)*]

Resume OPDIVO in patients whose adverse reactions recover to Grade 0-1.

Permanently discontinue OPDIVO for any of the following:

- Any life-threatening or Grade 4 adverse reaction
- Grade 3 or 4 pneumonitis [see *Warnings and Precautions (5.1)*]
- Grade 4 colitis [see *Warnings and Precautions (5.2)*]
- AST or ALT greater than 5 times ULN or total bilirubin greater than 3 times ULN [see *Warnings and Precautions (5.3)*]
- Creatinine greater than 6 times ULN [see *Warnings and Precautions (5.4)*]
- Any severe or Grade 3 treatment-related adverse reaction that recurs
- Inability to reduce corticosteroid dose to 10 mg or less of prednisone or equivalent per day within 12 weeks

- Persistent Grade 2 or 3 treatment-related adverse reactions that do not recover to Grade 0-1 within 12 weeks after last dose of OPDIVO

2.3 Preparation and Administration

Visually inspect drug product solution for particulate matter and discoloration prior to administration. OPDIVO is a clear to opalescent, colorless to pale-yellow solution. Discard the vial if the solution is cloudy, is discolored, or contains extraneous particulate matter other than a few translucent-to-white, proteinaceous particles. Do not shake the vial.

Preparation

- Withdraw the required volume of OPDIVO and transfer into an intravenous container.
- Dilute OPDIVO with either 0.9% Sodium Chloride Injection, USP or 5% Dextrose Injection, USP, to prepare an infusion with a final concentration ranging from 1 mg/mL to 10 mg/mL.
- Mix diluted solution by gentle inversion. Do not shake.
- Discard partially used vials or empty vials of OPDIVO.

Storage of Infusion

The product does not contain a preservative.

After preparation, store the OPDIVO infusion either:

- at room temperature for no more than 4 hours from the time of preparation. This includes room temperature storage of the infusion in the IV container and time for administration of the infusion or
- under refrigeration at 2°C to 8°C (36°F-46°F) for no more than 24 hours from the time of infusion preparation.

Do not freeze.

Administration

Administer the infusion over 60 minutes through an intravenous line containing a sterile, non-pyrogenic, low protein binding in-line filter (pore size of 0.2 micrometer to 1.2 micrometer).

Do not coadminister other drugs through the same intravenous line.

Flush the intravenous line at end of infusion.

3 DOSAGE FORMS AND STRENGTHS

Injection: 40 mg/4 mL (10 mg/mL) and 100 mg/10 mL (10 mg/mL) solution in a single-use vial.

4 CONTRAINDICATIONS

None.

5 WARNINGS AND PRECAUTIONS

5.1 Immune-Mediated Pneumonitis

Severe pneumonitis or interstitial lung disease, including fatal cases, occurred with OPDIVO treatment. Across the clinical trial experience in 574 patients with solid tumors, fatal immune-mediated pneumonitis occurred in 0.9% (5/574) of patients receiving OPDIVO. No cases of fatal pneumonitis occurred in Trial 1; all five fatal cases occurred in a dose-finding study with OPDIVO doses of 1 mg/kg (two patients), 3 mg/kg (two patients), and 10 mg/kg (one patient).

In Trial 1, pneumonitis, including interstitial lung disease, occurred in 3.4% (9/268) of patients receiving OPDIVO and none of the 102 patients receiving chemotherapy. Immune-mediated pneumonitis, defined as requiring use of corticosteroids and no clear alternate etiology, occurred in 2.2% (6/268) of patients receiving OPDIVO: one with Grade 3 and five with Grade 2 pneumonitis. The median time to onset for the six cases was 2.2 months (range: 25 days-3.5 months). In two patients, pneumonitis was diagnosed after discontinuation of OPDIVO for other reasons, and Grade 2 pneumonitis led to interruption or permanent discontinuation of OPDIVO in the remaining four patients. All six patients received high-dose corticosteroids (at least 40 mg prednisone equivalents per day); immune-mediated pneumonitis improved to Grade 0 or 1 with corticosteroids in all six patients. There were two patients with Grade 2 pneumonitis that completely resolved (defined as improved to Grade 0 with completion of corticosteroids) and OPDIVO was restarted without recurrence of pneumonitis.

Monitor patients for signs and symptoms of pneumonitis. Administer corticosteroids at a dose of 1 to 2 mg/kg/day prednisone equivalents for Grade 2 or greater pneumonitis, followed by corticosteroid taper. Permanently discontinue OPDIVO for severe (Grade 3) or life-threatening (Grade 4) pneumonitis and withhold OPDIVO until resolution for moderate (Grade 2) pneumonitis [*see Dosage and Administration (2.2)*].

5.2 Immune-Mediated Colitis

In Trial 1, diarrhea or colitis occurred in 21% (57/268) of patients receiving OPDIVO and 18% (18/102) of patients receiving chemotherapy. Immune-mediated colitis, defined as requiring use of corticosteroids with no clear alternate etiology, occurred in 2.2% (6/268) of patients receiving OPDIVO: five patients with Grade 3 and one patient with Grade 2 colitis. The median time to onset of immune-mediated colitis from initiation of OPDIVO was 2.5 months (range: 1-6 months). In three patients, colitis was diagnosed after discontinuation of OPDIVO for other reasons, and Grade 2 or 3 colitis led to interruption or permanent discontinuation of OPDIVO in the remaining three patients. Five of these six patients received high-dose corticosteroids (at least 40 mg prednisone equivalents) for a median duration of 1.4 months (range: 3 days-2.4 months) preceding corticosteroid taper. The sixth patient continued on low-dose corticosteroids started for another immune-mediated adverse reaction. Immune-mediated colitis improved to Grade 0 with corticosteroids in five patients, including one patient with Grade 3 colitis retreated after complete resolution (defined as improved to Grade 0 with completion of corticosteroids) without additional events of colitis. Grade 2 colitis was ongoing in one patient.

Monitor patients for immune-mediated colitis. Administer corticosteroids at a dose of 1 to 2 mg/kg/day prednisone equivalents followed by corticosteroid taper for severe (Grade 3) or life-threatening (Grade 4) colitis. Administer corticosteroids at a dose of 0.5 to 1 mg/kg/day prednisone equivalents followed by corticosteroid taper for moderate (Grade 2) colitis of more than 5 days duration; if worsening or no improvement occurs despite initiation of corticosteroids, increase dose to 1 to 2 mg/kg/day prednisone equivalents. Withhold OPDIVO for Grade 2 or 3 immune-mediated colitis. Permanently discontinue OPDIVO for Grade 4 colitis or for recurrent colitis upon restarting OPDIVO [see *Dosage and Administration* (2.2)].

5.3 Immune-Mediated Hepatitis

In Trial 1, there was an increased incidence of liver test abnormalities in the OPDIVO-treated group as compared to the chemotherapy-treated group, with increases in AST (28% vs. 12%), alkaline phosphatase (22% vs. 13%), ALT (16% vs. 5%), and total bilirubin (9% vs. 0). Immune-mediated hepatitis, defined as requirement for corticosteroids and no clear alternate etiology, occurred in 1.1% (3/268) of patients receiving OPDIVO: two patients with Grade 3 and one patient with Grade 2 hepatitis. The time to onset was 97, 113, and 86 days after initiation of OPDIVO. In one patient, hepatitis was diagnosed after discontinuation of OPDIVO for other reasons. In two patients, OPDIVO was withheld. All three patients received high-dose corticosteroids (at least 40 mg prednisone equivalents). Liver tests improved to Grade 1 within 4-15 days of initiation of corticosteroids. Immune-mediated hepatitis resolved and did not recur with continuation of corticosteroids in two patients; the third patient died of disease progression with persistent hepatitis. The two patients with Grade 3 hepatitis that resolved restarted OPDIVO and, in one patient, Grade 3 immune-mediated hepatitis recurred resulting in permanent discontinuation of OPDIVO.

Monitor patients for abnormal liver tests prior to and periodically during treatment. Administer corticosteroids at a dose of 1 to 2 mg/kg/day prednisone equivalents for Grade 2 or greater transaminase elevations, with or without concomitant elevation in total bilirubin. Withhold OPDIVO for moderate (Grade 2) and permanently discontinue OPDIVO for severe (Grade 3) or life-threatening (Grade 4) immune-mediated hepatitis [see *Dosage and Administration* (2.2) and *Adverse Reactions* (6.1)].

5.4 Immune-Mediated Nephritis and Renal Dysfunction

In Trial 1, there was an increased incidence of elevated creatinine in the OPDIVO-treated group as compared to the chemotherapy-treated group (13% vs. 9%). Grade 2 or 3 immune-mediated nephritis or renal dysfunction (defined as $\geq$ Grade 2 increased creatinine, requirement for corticosteroids, and no clear alternate etiology) occurred in 0.7% (2/268) of patients at 3.5 and 6 months after OPDIVO initiation, respectively. OPDIVO was permanently discontinued in both patients; both received high-dose corticosteroids (at least 40 mg prednisone equivalents). Immune-mediated nephritis resolved and did not recur with continuation of corticosteroids in one patient. Renal dysfunction was ongoing in one patient.

Monitor patients for elevated serum creatinine prior to and periodically during treatment. Administer corticosteroids at a dose of 1 to 2 mg/kg/day prednisone equivalents followed by corticosteroid taper for life-threatening (Grade 4) serum creatinine elevation and permanently discontinue OPDIVO. For severe (Grade 3) or moderate (Grade 2) serum creatinine elevation, withhold OPDIVO and administer corticosteroids at a dose of 0.5 to 1 mg/kg/day prednisone equivalents followed by corticosteroid taper; if worsening or no improvement occurs, increase dose of corticosteroids to 1 to 2 mg/kg/day prednisone equivalents and permanently discontinue OPDIVO [see *Dosage and Administration (2.2)* and *Adverse Reactions (6.1)*].

5.5 Immune-Mediated Hypothyroidism and Hyperthyroidism

In Trial 1, where patients were evaluated at baseline and during the trial for thyroid function, Grade 1 or 2 hypothyroidism occurred in 8% (21/268) of patients receiving OPDIVO and none of the 102 patients receiving chemotherapy. The median time to onset was 2.5 months (range: 24 days-11.7 months). Seventeen of the 21 patients with hypothyroidism received levothyroxine. Fifteen of 17 patients received subsequent OPDIVO dosing while continuing to receive levothyroxine.

Grade 1 or 2 hyperthyroidism occurred in 3% (8/268) of patients receiving OPDIVO and 1% (1/102) of patients receiving chemotherapy. The median time to onset in OPDIVO-treated patients was 1.6 months (range: 0-3.3 months). Four of five patients with Grade 1 hyperthyroidism and two of three patients with Grade 2 hyperthyroidism had documented resolution of hyperthyroidism; all three patients received medical management for Grade 2 hyperthyroidism.

Monitor thyroid function prior to and periodically during treatment. Administer hormone replacement therapy for hypothyroidism. Initiate medical management for control of hyperthyroidism. There are no recommended dose adjustments of OPDIVO for hypothyroidism or hyperthyroidism.

5.6 Other Immune-Mediated Adverse Reactions

Other clinically significant immune-mediated adverse reactions can occur. Immune-mediated adverse reactions may occur after discontinuation of OPDIVO therapy.

The following clinically significant, immune-mediated adverse reactions occurred in less than 1% of OPDIVO-treated patients in Trial 1: pancreatitis, uveitis, demyelination, autoimmune neuropathy, adrenal insufficiency, and facial and abducens nerve paresis.

Across clinical trials of OPDIVO administered at doses of 3 mg/kg and 10 mg/kg the following additional clinically significant, immune-mediated adverse reactions were identified: hypophysitis, diabetic ketoacidosis, hypopituitarism, Guillain-Barré syndrome, and myasthenic syndrome.

For any suspected immune-mediated adverse reactions, exclude other causes. Based on the severity of the adverse reaction, withhold OPDIVO, administer high-dose corticosteroids, and if appropriate, initiate hormone-replacement therapy. Upon improvement to Grade 1 or less, initiate

corticosteroid taper and continue to taper over at least 1 month. Consider restarting OPDIVO after completion of corticosteroid taper based on the severity of the event [see *Dosage and Administration* (2.2)].

5.7 Embryofetal Toxicity

Based on its mechanism of action and data from animal studies, OPDIVO can cause fetal harm when administered to a pregnant woman. In animal reproduction studies, administration of nivolumab to cynomolgus monkeys from the onset of organogenesis through delivery resulted in increased abortion and premature infant death. Advise pregnant women of the potential risk to a fetus. Advise females of reproductive potential to use effective contraception during treatment with OPDIVO and for at least 5 months after the last dose of OPDIVO [see *Use in Specific Populations* (8.1, 8.3)].

6 ADVERSE REACTIONS

The following adverse reactions are discussed in greater detail in other sections of the labeling.

- Immune-Mediated Pneumonitis [see *Warnings and Precautions* (5.1)]
- Immune-Mediated Colitis [see *Warnings and Precautions* (5.2)]
- Immune-Mediated Hepatitis [see *Warnings and Precautions* (5.3)]
- Immune-Mediated Nephritis and Renal Dysfunction [see *Warnings and Precautions* (5.4)]
- Immune-Mediated Hypothyroidism and Hyperthyroidism [see *Warnings and Precautions* (5.5)]
- Other Immune-Mediated Adverse Reactions [see *Warnings and Precautions* (5.6)]

6.1 Clinical Trials Experience

Because clinical trials are conducted under widely varying conditions, the adverse reaction rates observed in the clinical trials of a drug cannot be directly compared to rates in the clinical trials of another drug and may not reflect the rates observed in clinical practice.

The data described in the WARNINGS and PRECAUTIONS section and below reflect exposure to OPDIVO in Trial 1, a randomized, open-label trial in which 370 patients with unresectable or metastatic melanoma received OPDIVO 3 mg/kg every 2 weeks (n=268) or investigator's choice of chemotherapy (n=102), either dacarbazine 1000 mg/m² every 3 weeks or the combination of carboplatin AUC 6 every 3 weeks plus paclitaxel 175 mg/m² every 3 weeks [see *Clinical Studies* (14)]. The median duration of exposure was 5.3 months (range: 1 day-13.8+ months) with a median of eight doses (range: 1 to 31) in OPDIVO-treated patients and was 2 months (range: 1 day-9.6+ months) in chemotherapy treated patients. In this ongoing trial, 24% of patients received OPDIVO for greater than 6 months and 3% of patients received OPDIVO for greater than 1 year.

Clinically significant adverse reactions were also evaluated in 574 patients with solid tumors enrolled in two clinical trials receiving OPDIVO at doses of 0.1 to 10 mg/kg every 2 weeks,

supplemented by immune-mediated adverse reaction reports across ongoing clinical trials [see *Warnings and Precautions* (5.1, 5.6)].

In Trial 1, patients had documented disease progression following treatment with ipilimumab and, if BRAF V600 mutation positive, a BRAF inhibitor. The trial excluded patients with autoimmune disease, prior ipilimumab-related Grade 4 adverse reactions (except for endocrinopathies) or Grade 3 ipilimumab-related adverse reactions that had not resolved or were inadequately controlled within 12 weeks of the initiating event, patients with a condition requiring chronic systemic treatment with corticosteroids (>10 mg daily prednisone equivalent) or other immunosuppressive medications, a positive test for hepatitis B or C, and a history of HIV.

The study population characteristics in the OPDIVO group and the chemotherapy group were similar: 66% male, median age 59.5 years, 98% white, baseline ECOG performance status 0 (59%) or 1 (41%), 74% with M1c stage disease, 73% with cutaneous melanoma, 11% with mucosal melanoma, 73% received two or more prior therapies for advanced or metastatic disease, and 18% had brain metastasis. There were more patients in the OPDIVO group with elevated LDH at baseline (51% vs. 38%).

OPDIVO was discontinued for adverse reactions in 9% of patients. Twenty-six percent of patients receiving OPDIVO had a drug delay for an adverse reaction. Serious adverse reactions occurred in 41% of patients receiving OPDIVO. Grade 3 and 4 adverse reactions occurred in 42% of patients receiving OPDIVO. The most frequent Grade 3 and 4 adverse reactions reported in 2% to less than 5% of patients receiving OPDIVO were abdominal pain, hyponatremia, increased aspartate aminotransferase, and increased lipase.

Table 1 summarizes the adverse reactions that occurred in at least 10% of OPDIVO-treated patients. The most common adverse reaction (reported in at least 20% of patients) was rash.

Table 1: Selected Adverse Reactions Occurring in ≥10% of OPDIVO-Treated Patients and at a Higher Incidence than in the Chemotherapy Arm (Between Arm Difference of ≥5% [All Grades] or ≥2% [Grades 3-4]) (Trial 1)

Adverse Reaction	OPDIVO (n=268)		Chemotherapy (n=102)	
	All Grades	Grades 3-4	All Grades	Grades 3-4
Percentage (%) of Patients				
Skin and Subcutaneous Tissue Disorders				
Rash ^a	21	0.4	7	0
Pruritus	19	0	3.9	0
Respiratory, Thoracic, and Mediastinal Disorders				
Cough	17	0	6	0

Table 1: Selected Adverse Reactions Occurring in $\geq 10\%$ of OPDIVO-Treated Patients and at a Higher Incidence than in the Chemotherapy Arm (Between Arm Difference of $\geq 5\%$ [All Grades] or $\geq 2\%$ [Grades 3-4]) (Trial 1)

Adverse Reaction	OPDIVO (n=268)		Chemotherapy (n=102)	
	All Grades	Grades 3-4	All Grades	Grades 3-4
	Percentage (%) of Patients			
Infections and Infestations				
Upper respiratory tract infection ^b	11	0	2.0	0
General Disorders and Administration Site Conditions				
Peripheral edema	10	0	5	0

^a Rash is a composite term which includes maculopapular rash, rash erythematous, rash pruritic, rash follicular, rash macular, rash papular, rash pustular, rash vesicular, and dermatitis acneiform.

^b Upper respiratory tract infection is a composite term which includes rhinitis, pharyngitis, and nasopharyngitis.

Other clinically important adverse reactions in less than 10% of patients treated with OPDIVO were:

Cardiac Disorders: ventricular arrhythmia

Eye Disorders: iridocyclitis

General Disorders and Administration Site Conditions: infusion-related reactions

Investigations: increased amylase, increased lipase

Nervous System Disorders: dizziness, peripheral and sensory neuropathy

Skin and Subcutaneous Tissue Disorders: exfoliative dermatitis, erythema multiforme, vitiligo, psoriasis.

Table 2: Selected Laboratory Abnormalities Increased from Baseline Occurring in $\geq 10\%$ of OPDIVO-Treated Patients and at a Higher Incidence than in the Chemotherapy Arm (Between Arm Difference of $\geq 5\%$ [All Grades] or $\geq 2\%$ [Grades 3-4]) (Trial 1)

Test	Percentage of Patients with Worsening Laboratory Test from Baseline ^a			
	OPDIVO		Chemotherapy	
	All Grades	Grades 3-4	All Grades	Grades 3-4
Increased AST	28	2.4	12	1.0
Increased alkaline phosphatase	22	2.4	13	1.1
Hyponatremia	25	5	18	1.1
Increased ALT	16	1.6	5	0
Hyperkalemia	15	2.0	6	0

^a Each test incidence is based on the number of patients who had both baseline and at least one on-study laboratory measurement available: OPDIVO group (range 252 to 256 patients) and chemotherapy group (range 94 to 96 patients).

6.2 Immunogenicity

As with all therapeutic proteins, there is a potential for immunogenicity.

Of 281 patients who were treated with OPDIVO 3 mg/kg every 2 weeks and evaluable for the presence of anti-product antibodies, 24 patients (8.5%) tested positive for treatment-emergent anti-product antibodies by an electrochemiluminescent (ECL) assay. Neutralizing antibodies were detected in two patients (0.7%). There was no evidence of altered pharmacokinetic profile or toxicity profile with anti-product binding antibody development based on the population pharmacokinetic and exposure-response analyses.

The detection of antibody formation is highly dependent on the sensitivity and specificity of the assay. Additionally, the observed incidence of antibody (including neutralizing antibody) positivity in an assay may be influenced by several factors including assay methodology, sample handling, timing of sample collection, concomitant medications, and underlying disease. For these reasons, comparison of incidence of antibodies to OPDIVO with the incidences of antibodies to other products may be misleading.

7 DRUG INTERACTIONS

No formal pharmacokinetic drug-drug interaction studies have been conducted with OPDIVO.

8 USE IN SPECIFIC POPULATIONS

8.1 Pregnancy

Risk Summary

Based on its mechanism of action [see *Clinical Pharmacology* (12.1)] and data from animal studies, OPDIVO can cause fetal harm when administered to a pregnant woman [see *Clinical Pharmacology* (12.1)]. In animal reproduction studies, administration of nivolumab to

cynomolgus monkeys from the onset of organogenesis through delivery resulted in increased abortion and premature infant death [see *Data*]. Human IgG4 is known to cross the placental barrier and nivolumab is an immunoglobulin G4 (IgG4); therefore, nivolumab has the potential to be transmitted from the mother to the developing fetus. The effects of OPDIVO are likely to be greater during the second and third trimesters of pregnancy. There are no available human data informing the drug-associated risk. Advise pregnant women of the potential risk to a fetus.

The background risk of major birth defects and miscarriage for the indicated population is unknown; however, the background risk in the U.S. general population of major birth defects is 2-4% and of miscarriage is 15-20% of clinically recognized pregnancies.

Data

Animal Data

A central function of the PD-1/PD-L1 pathway is to preserve pregnancy by maintaining maternal immune tolerance to the fetus. Blockade of PD-L1 signaling has been shown in murine models of pregnancy to disrupt tolerance to the fetus and to increase fetal loss. The effects of nivolumab on prenatal and postnatal development were evaluated in monkeys that received nivolumab twice weekly from the onset of organogenesis through delivery, at exposure levels of between 9 and 42 times higher than those observed at the clinical dose of 3 mg/kg of nivolumab (based on AUC). Nivolumab administration resulted in a non-dose-related increase in spontaneous abortion and increased neonatal death. Based on its mechanism of action, fetal exposure to nivolumab may increase the risk of developing immune-mediated disorders or altering the normal immune response and immune-mediated disorders have been reported in PD-1 knockout mice. In surviving infants (18 of 32 compared to 11 of 16 vehicle-exposed infants) of cynomolgus monkeys treated with nivolumab, there were no apparent malformations and no effects on neurobehavioral, immunological, or clinical pathology parameters throughout the 6-month postnatal period.

8.2 Lactation

Risk Summary

It is not known whether OPDIVO is present in human milk. Because many drugs, including antibodies are excreted in human milk and because of the potential for serious adverse reactions in nursing infants from OPDIVO, advise women to discontinue breastfeeding during treatment with OPDIVO.

8.3 Females and Males of Reproductive Potential

Contraception

Based on its mechanism of action, OPDIVO can cause fetal harm when administered to a pregnant woman [see *Use in Specific Populations (8.1)*]. Advise females of reproductive potential to use effective contraception during treatment with OPDIVO and for at least 5 months following the last dose of OPDIVO.

8.4 Pediatric Use

The safety and effectiveness of OPDIVO have not been established in pediatric patients.

8.5 Geriatric Use

Clinical studies of OPDIVO did not include sufficient numbers of patients aged 65 years and older to determine whether they respond differently from younger patients. Of the 272 patients randomized to OPDIVO in Trial 1, 35% of patients were 65 years or older and 15% were 75 years or older.

8.6 Renal Impairment

Based on a population pharmacokinetic analysis, no dose adjustment is recommended in patients with renal impairment [see *Clinical Pharmacology* (12.3)].

8.7 Hepatic Impairment

Based on a population pharmacokinetic analysis, no dose adjustment is recommended for patients with mild hepatic impairment. OPDIVO has not been studied in patients with moderate or severe hepatic impairment [see *Clinical Pharmacology* (12.3)].

10 OVERDOSAGE

There is no information on overdosage with OPDIVO.

11 DESCRIPTION

Nivolumab is a human monoclonal antibody that blocks the interaction between PD-1 and its ligands, PD-L1 and PD-L2. Nivolumab is an IgG4 kappa immunoglobulin that has a calculated molecular mass of 146 kDa.

OPDIVO is a sterile, preservative-free, non-pyrogenic, clear to opalescent, colorless to pale-yellow liquid that may contain light (few) particles. OPDIVO injection for intravenous infusion is supplied in single-use vials. Each mL of OPDIVO solution contains nivolumab 10 mg, mannitol (30 mg), pentetic acid (0.008 mg), polysorbate 80 (0.2 mg), sodium chloride (2.92 mg), sodium citrate dihydrate (5.88 mg), and Water for Injection, USP. May contain hydrochloric acid and/or sodium hydroxide to adjust pH to 6.

12 CLINICAL PHARMACOLOGY

12.1 Mechanism of Action

Binding of the PD-1 ligands, PD-L1 and PD-L2, to the PD-1 receptor found on T cells, inhibits T-cell proliferation and cytokine production. Upregulation of PD-1 ligands occurs in some tumors and signaling through this pathway can contribute to inhibition of active T-cell immune surveillance of tumors. Nivolumab is a human immunoglobulin G4 (IgG4) monoclonal antibody that binds to the PD-1 receptor and blocks its interaction with PD-L1 and PD-L2, releasing PD-1 pathway-mediated inhibition of the immune response, including the anti-tumor immune

response. In syngeneic mouse tumor models, blocking PD-1 activity resulted in decreased tumor growth.

12.3 Pharmacokinetics

The pharmacokinetics (PK) of nivolumab was studied in patients over a dose range of 0.1 to 20 mg/kg administered as a single dose or as multiple doses of OPDIVO every 2 or 3 weeks. Based on a population pharmacokinetic (PK) analysis using data from 909 patients, the geometric mean (% coefficient of variation [CV%]) clearance (CL) is 9.5 mL/h (49.7%), geometric mean volume of distribution at steady state (V_{ss}) is 8.0 L (30.4%), and geometric mean elimination half-life ($t_{1/2}$) is 26.7 days (101%). Steady-state concentrations of nivolumab were reached by 12 weeks when administered at 3 mg/kg every 2 weeks, and systemic accumulation was approximately 3-fold. The exposure to nivolumab increased dose proportionally over the dose range of 0.1 to 10 mg/kg administered every 2 weeks.

Specific Populations: Based on a population PK analysis using data from 909 patients, the clearance of nivolumab increased with increasing body weight supporting a weight-based dose. The population PK analysis suggested that the following factors had no clinically important effect on the clearance of nivolumab: age (29 to 87 years), gender, race, baseline LDH, PD-L1 expression, tumor type, tumor size, renal impairment, and mild hepatic impairment.

Renal Impairment: The effect of renal impairment on the clearance of nivolumab was evaluated by a population PK analysis in patients with mild (eGFR 60 to 89 mL/min/1.73 m²; n=313), moderate (eGFR 30 to 59 mL/min/1.73 m²; n=140), or severe (eGFR 15 to 29 mL/min/1.73 m²; n=3) renal impairment. No clinically important differences in the clearance of nivolumab were found between patients with renal impairment and patients with normal renal function [see Use in Specific Populations (8.6)].

Hepatic Impairment: The effect of hepatic impairment on the clearance of nivolumab was evaluated by population PK analyses in patients with mild hepatic impairment (total bilirubin [TB] less than or equal to the upper limit of normal [ULN] and AST greater than ULN or TB less than 1 to 1.5 times ULN and any AST; n=92). No clinically important differences in the clearance of nivolumab were found between patients with mild hepatic impairment and patients with normal hepatic function. Nivolumab has not been studied in patients with moderate (TB greater than 1.5 to 3 times ULN and any AST) or severe hepatic impairment (TB greater than 3 times ULN and any AST) [see Use in Specific Populations (8.7)].

13 NONCLINICAL TOXICOLOGY

13.1 Carcinogenesis, Mutagenesis, Impairment of Fertility

No studies have been performed to assess the potential of nivolumab for carcinogenicity or genotoxicity. Fertility studies have not been performed with nivolumab. In 1-month and 3-month repeat-dose toxicology studies in monkeys, there were no notable effects in the male and female reproductive organs; however, most animals in these studies were not sexually mature.

13.2 Animal Toxicology and/or Pharmacology

In animal models, inhibition of PD-1 signaling increased the severity of some infections and enhanced inflammatory responses. *M. tuberculosis*-infected PD-1 knockout mice exhibit markedly decreased survival compared with wild-type controls, which correlated with increased bacterial proliferation and inflammatory responses in these animals. PD-1 knockout mice have also shown decreased survival following infection with lymphocytic choriomeningitis virus.

14 CLINICAL STUDIES

Trial 1 was a multicenter, open-label trial that randomized (2:1) patients with unresectable or metastatic melanoma to receive either OPDIVO administered intravenously at 3 mg/kg every 2 weeks or investigator's choice of chemotherapy, either single-agent dacarbazine 1000 mg/m² every 3 weeks or the combination of carboplatin AUC 6 every 3 weeks plus paclitaxel 175 mg/m² every 3 weeks. Patients were required to have progression of disease on or following ipilimumab treatment and, if BRAF V600 mutation positive, a BRAF inhibitor. The trial excluded patients with autoimmune disease, medical conditions requiring systemic immunosuppression, ocular melanoma, active brain metastasis, or a history of Grade 4 ipilimumab-related adverse reactions (except for endocrinopathies) or Grade 3 ipilimumab-related adverse reactions that had not resolved or were inadequately controlled within 12 weeks of the initiating event. Tumor assessments were conducted 9 weeks after randomization then every 6 weeks for the first year, and every 12 weeks thereafter.

Efficacy was evaluated in a single-arm, non-comparative, planned interim analysis of the first 120 patients who received OPDIVO in Trial 1 and in whom the minimum duration of follow up was 6 months. The major efficacy outcome measures in this population were confirmed objective response rate (ORR) as measured by blinded independent central review using Response Evaluation Criteria in Solid Tumors (RECIST 1.1) and duration of response.

Among the 120 patients treated with OPDIVO, the median age was 58 years (range: 25-88), 65% of patients were male, 98% were white, and the ECOG PS was 0 (58%) or 1 (42%). Disease characteristics were M1c disease (76%), BRAF V600 mutation positive (22%), elevated LDH (56%), history of brain metastases (18%), and two or more prior systemic therapies for metastatic disease (68%).

The ORR was 32% (95% confidence interval: 23, 41), consisting of 4 complete responses and 34 partial responses in OPDIVO-treated patients. Of 38 patients with responses, 33 patients (87%) had ongoing responses with durations ranging from 2.6+ to 10+ months, which included 13 patients with ongoing responses of 6 months or longer.

There were objective responses in patients with and without BRAF V600 mutation positive-melanoma.

16 HOW SUPPLIED/STORAGE AND HANDLING

OPDIVO® (nivolumab) is available as follows:

Carton Contents	NDC
40 mg/4 mL single-use vial	0003-3772-11
100 mg/10 mL single-use vial	0003-3774-12

Store OPDIVO under refrigeration at 2°C to 8°C (36°F-46°F). Protect OPDIVO from light by storing in the original package until time of use. Do not freeze or shake.

17 PATIENT COUNSELING INFORMATION

Advise the patient to read the FDA-approved patient labeling (Medication Guide).

Inform patients of the risk of immune-mediated adverse reactions that may require corticosteroid treatment and interruption or discontinuation of OPDIVO, including:

- Pneumonitis: Advise patients to contact their healthcare provider immediately for any new or worsening cough, chest pain, or shortness of breath *[see Warnings and Precautions (5.1)]*.
- Colitis: Advise patients to contact their healthcare provider immediately for diarrhea or severe abdominal pain *[see Warnings and Precautions (5.2)]*.
- Hepatitis: Advise patients to contact their healthcare provider immediately for jaundice, severe nausea or vomiting, pain on the right side of abdomen, lethargy, or easy bruising or bleeding *[see Warnings and Precautions (5.3)]*.
- Nephritis and Renal Dysfunction: Advise patients to contact their healthcare provider immediately for signs or symptoms of nephritis including decreased urine output, blood in urine, swelling in ankles, loss of appetite, and any other symptoms of renal dysfunction *[see Warnings and Precautions (5.4)]*.
- Hypothyroidism and Hyperthyroidism: Advise patients to contact their healthcare provider immediately for signs or symptoms of hypothyroidism and hyperthyroidism *[see Warnings and Precautions (5.5)]*.

Advise patients of the importance of keeping scheduled appointments for blood work or other laboratory tests *[see Warnings and Precautions (5.3, 5.4, 5.5, 5.6)]*.

Advise females of reproductive potential of the potential risk to a fetus and to inform their healthcare provider of a known or suspected pregnancy *[see Warnings and Precautions (5.7), Use in Specific Populations (8.1)]*.

Advise females of reproductive potential to use effective contraception during treatment with OPDIVO and for at least 5 months following the last dose of OPDIVO *[see Use in Specific Populations (8.3)]*.

Advise women not to breastfeed while taking OPDIVO *[see Use in Specific Populations (8.2)]*.

Manufactured by:
Bristol-Myers Squibb Company
Princeton, NJ 08543 USA

U.S. License No. 1713

1321663

MEDICATION GUIDE
OPDIVO[®] (op-DEE-voh)
(nivolumab)
injection

Read this Medication Guide before you start receiving OPDIVO and before each infusion. There may be new information. This Medication Guide does not take the place of talking with your healthcare provider about your medical condition or your treatment.

What is the most important information I should know about OPDIVO?

OPDIVO is a medicine that may treat your melanoma by working with your immune system. OPDIVO can cause your immune system to attack normal organs and tissues in many areas of your body and can affect the way they work. These problems can sometimes become serious or life-threatening and can lead to death. These problems may happen anytime during treatment or even after your treatment has ended.

Call or see your healthcare provider right away if you develop any symptoms of the following problems or these symptoms get worse:

Lung problems (pneumonitis). Symptoms of pneumonitis may include:

- new or worsening cough
- chest pain
- shortness of breath

Intestinal problems (colitis) that can lead to tears or holes in your intestine. Signs and symptoms of colitis may include:

- diarrhea (loose stools) or more bowel movements than usual
- blood in your stools or dark, tarry, sticky stools
- severe stomach area (abdomen) pain or tenderness

Liver problems (hepatitis). Signs and symptoms of hepatitis may include:

- yellowing of your skin or the whites of your eyes
- severe nausea or vomiting
- pain on the right side of your stomach-area (abdomen)
- drowsiness
- dark urine (tea colored)
- bleeding or bruise more easily than normal
- feeling less hungry than usual

Kidney problems, including nephritis and kidney failure. Signs of kidney problems may include:

- decrease in the amount of urine
- blood in your urine
- swelling in your ankles
- loss of appetite

Hormone gland problems (especially the thyroid, pituitary, and glands). Signs and symptoms that your hormone glands are not working properly may include:

- headaches that will not go away or unusual headaches
- extreme tiredness
- weight gain or weight loss
- changes in mood or behavior, such as decreased sex drive, irritability, or forgetfulness
- dizziness or fainting
- hair loss
- feeling cold
- constipation
- voice gets deeper

Problems in other organs. Signs of these problems include:

- rash
- changes in eyesight
- severe or persistent muscle or joint pains
- severe muscle weakness

Getting medical treatment right away may keep these problems from becoming more serious.

Your healthcare provider will check you for these problems during treatment with OPDIVO. Your healthcare provider may treat you with corticosteroid medicines and delay or completely stop treatment with OPDIVO, if you have severe side effects.

What is OPDIVO?

OPDIVO is a prescription medicine used to treat a type of skin cancer called melanoma

OPDIVO may be used when your melanoma:

- has spread or cannot be removed by surgery (advanced melanoma)

and,

- after you have tried a medicine called ipilimumab and it did not work or is no longer working

and,

- if your tumor has an abnormal “BRAF” gene, and you have also tried a different medicine called a BRAF inhibitor, and it did not work or is no longer working.

It is not known if OPDIVO is safe and effective in children less than 18 years of age.

What should I tell my healthcare provider before receiving OPDIVO?

Before you receive OPDIVO, tell your healthcare provider if you:

- have immune system problems such as Crohn’s disease, ulcerative colitis, or lupus
- have had an organ transplant
- have lung, or breathing problems
- have liver problems
- have any other medical conditions
- are pregnant or plan to become pregnant.
- OPDIVO can harm your unborn baby.
- Females who are able to become pregnant should use an effective method of birth control during and for at least 5 months after the last dose of OPDIVO. Talk to your healthcare provider about birth control methods that you can use during this time.
- Tell your healthcare provider right away if you become pregnant during treatment with OPDIVO.
- are breastfeeding or plan to breastfeed
- It is not known if OPDIVO passes into your breast milk
- Do not breastfeed during treatment with OPDIVO.

Tell your healthcare provider about all the medicines you take, including prescription and over-the-counter medicines, vitamins, and herbal supplements.

Know the medicines you take. Keep a list of them to show your healthcare providers and pharmacist when you get a new medicine.

How will I receive OPDIVO?

- Your healthcare provider will give you OPDIVO into your vein through an intravenous (IV) line over 60 minutes.
- OPDIVO is usually given every 2 weeks.
- Your healthcare provider will decide how many treatments you need.
- Your healthcare provider will do blood tests to check you for side effects.
- If you miss any appointments call your healthcare provider as soon as possible to reschedule your appointment.

What are the possible side effects of OPDIVO?

OPDIVO can cause serious side effects. See “What is the most important information I should know about OPDIVO?”

The most common side effects of OPDIVO include:

- rash

Tell your healthcare provider if you have any side effect that bothers you or that does not go away.

These are not all the possible side effects of OPDIVO. For more information, ask your healthcare provider or pharmacist.

Call your doctor for medical advice about side effects. You may report side effects to FDA at 1-800-FDA-1088.

General information about the safe and effective use of OPDIVO.

Medicines are sometimes prescribed for purposes other than those listed in a Medication Guide. If you would like more information about OPDIVO, talk with your healthcare provider. You can ask your healthcare provider for information about OPDIVO that is written for health professionals.

For more information, call 1-855-673-4861 or go to www.OPDIVO.com.

What are the ingredients in OPDIVO?

Active ingredient: nivolumab

Inactive ingredients: mannitol, pentetic acid, polysorbate 80, sodium chloride, sodium citrate dihydrate, and Water for Injection. May contain hydrochloric acid and/or sodium hydroxide.

This Medication Guide has been approved by the U.S. Food and Drug Administration.

Manufactured by:
Bristol-Myers Squibb Company
Princeton, NJ 08543 USA

U.S. License No. 1713

1321663

Issued December 2014

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

125554Orig1s004

CHEMISTRY REVIEW(S)



DEPARTMENT OF HEALTH & HUMAN SERVICES

US Food & Drug Administration
Center for Drug Evaluation & Research
Office of Biotechnology Products

MEMORANDUM

DATE: July 27, 2015

BLA: 125554/4 (eCTD#0053): WCB CP-PAS

FROM: Xianghong Jing, Ph.D., Product Quality Reviewer
CDER/OPQ/OBP/DBRRII

THROUGH: Xianghong Jing -S
Joel Welch, Ph.D., Product Quality Team Leader
CDER/OPQ/OBP/DBRRII

Joel T. Welch -S
Juhong Liu, Ph.D., Acting Review Chief
CDER/OPQ/OBP/DBRRII

PRODUCT: Nivolumab

PROPRIETARY NAME: Opdivo®

INDICATION: Melanoma

SPONSOR: Bristol-Myers Squibb

SUBJECT: **Prior Approval Supplement:** Comparability protocol to support the qualification of a new working cell bank for manufacture of drug substance

RECEIVED BY: FDA (eCTD submission): May 29, 2015

PDUFA GOAL DATE: Sept. 29, 2015

SUMMARY AND RECOMMENDATION:

The sponsor submitted a prior approval supplement to the Opdivo® (nivolumab) BLA 125554 to provide a qualification protocol to support the introduction of a new working cell bank generated from the current Master Cell Bank (b) (4) for manufacture of drug substance. The qualification results of the first three lots manufactured using the new WCB will be submitted in a CBE-30 submission. Qualification results from future new WCBs derived from the MCB (b) (4) will be submitted in an annual report.

The comparability protocol for qualification of a new WCB includes:

1. A tiered approach for new WCB characterization and comparability assessment:
 - 1.1 Biosafety, identity, and genetic characterization tests
 - 1.2 Process performance evaluation

1.3 Drug substance release result evaluation

1.4 Extended characterization test evaluation

2. Information related to re-evaluation of WCBs: this information has been previously provided in BLA sequence 0017 (dated 28-Oct-2014) and is incorporated here for completeness.

Based on the review of the submission and sponsor's response to the information request (BLA125554, sequence 0061), approval of this supplement is recommended. As agreed to in the responses to the Type C preliminary meeting response (dated March 4, 2015), a PMC is included to address the residual uncertainty of the clonality of the master cell bank.

APPROVAL LETTER LANGUAGE:

Your request to supplement your biologics license application for Opdivo® (nivolumab) to include a comparability protocol to support the qualification of a new working cell bank for manufacture of nivolumab drug substance has been approved.

We acknowledge your written commitment as described in your letter of July 27, 2015, as outlined below:

To evaluate each subclonal population in the master cell bank with respect to performance and product quality. Final Report Submission: January, 2016

REVIEW OF SUBMISSION:

Background

During the course of the BLA review, the Agency requested additional data in support of the clonality of the master cell bank. Post licensure, the sponsor requested a Type C meeting on February 13, 2015 (BLA125554/GI-1, eCTD#0042) to provide an update and seek feedback on the clonality evaluation and new WCB qualification of the (b) (4) cell line utilized in the manufacture of nivolumab drug substance.

The meeting package included: 1) a summary of the data presented in the license application to support the limit of in vitro cell age; 2) genetic characterization evaluation of the nivolumab cell line; 3) a product quality assessment of drug substance produced using the nivolumab cell line; 4) ongoing characterization of the nivolumab cell line; 5) proposed continued characterization and enhanced monitoring for the nivolumab protein; 6) proposal for qualification of new working cell banks.

BMS initiated characterization studies to further assess monoclonality of the cell line following submission of the license application. The original MCB, additional subclones, and additional end-of production cell bank (EPCB) from both Lonza and Syracuse manufacturing facilities were tested using (b) (4)

(b) (4)



(b) (4)



In general, FDA agreed with the approach adopted by the sponsor for the ongoing evaluation and characterization of the clonality of the nivolumab cell line. The following specific recommendations were proposed (showed in bold italic font below) and agreed by the sponsor as an outcome of the Type C meeting:

- 1) We recommend you provide a PAS for the purposes of qualifying the new WCB. The protocol acceptance criteria for the product quality assessment for the first three lots nivolumab DS should specify additional characterization (i.e., glycosylation pattern and enhanced peptide mapping) already intended for future lots of DS.***

- 2) *The protocol should include performance and growth characteristics with criteria based on manufacturing experience to date.*
- 3) *Results for the first three lots of DS manufactured from the new WCB should be submitted as a CBE-30 supplement.*
- 4) *We intend to propose a PMC as a condition of potential approval of the WCB PAS. The PMC would require subcloning the MCB to generate clonal populations of each individual subpopulation and to characterize each with respect to performance and product quality.*

Reviewer comment:

The comparison of release and extended characterization testing results of DS lots using (b) (4) as the dominant pattern WCB from Lonza and Syracuse sites showed no significant difference in product quality. Thus, the proposal to qualify a new WCB appears acceptable.

In this PAS submission, the strategy for qualification of a new WCB with a comparability protocol for product quality assessment and extended characterization complies with the previous recommendations.

1. Overview of the Tiered approach for new WCB qualification

(b) (4)

(b) (4)

(b) (4)



2. Reevaluation of new Working Cell Banks

(b) (4)



(b) (4)



Reviewer comment: *This piece of information has been previous reviewed in the BLA. The WCB reevaluation plan remains acceptable.*

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

125554Orig1s004

**ADMINISTRATIVE and CORRESPONDENCE
DOCUMENTS**



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

BLA 125554/004

INFORMATION REQUEST

Bristol-Myers Squibb Company
Attention: Ramji Krishnan, Ph.D.
Director, CMC Biologics
PO Box 4000
Princeton, NJ 08543-4000

Dear Dr. Krishnan:

Please refer to your Supplemental Biologics License Application (sBLA) dated May 29, 2015, received May 29, 2015, submitted under section 351(a) of the Public Health Service Act for Opdivo (Nivolumab/BMS-936558/MDX-1106).

We are reviewing your submission and have the following comments and information requests. We request a prompt written response by June 26, 2015 in order to continue our evaluation of your supplemental application.

Based on our review of the WCB qualification protocol in the submission 125554/4, we have the following comments:

(b) (4)



If you have questions, please contact me at (301) 796-2066 or Anita.Brown@fda.hhs.gov.

Sincerely,

Anita N.
Brown -S

Anita N. Brown
Regulatory Business Process Manager
Office of Program and Regulatory Operations
Office of Pharmaceutical Quality
Center for Drug Evaluation and Research

Digitally signed by Anita N. Brown -S
DN: c=US, o=U.S. Government, ou=HHS,
ou=FDA, ou=People, cn=Anita N. Brown
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Date: 2015.06.18 10:49:03 -04'00'



BLA 125554/004

**PRIOR APPROVAL SUPPLEMENT -
ACKNOWLEDGEMENT & FILING**

Bristol-Myers Squibb Company
Attention: Ramji Krishnan, Ph.D.
Associate Director, CMC Biologics
P.O. Box 4000
Princeton, NJ 08543-4000

Dear Dr. Krishnan:

We have received your Supplemental Biologics License Application (sBLA) submitted under section 351(a) of the Public Health Service Act for the following:

BLA SUPPLEMENT NUMBER:	125554/004
PRODUCT NAME:	Opdivo® (Nivolumab/BMS-936558/MDX-1106)
DATE OF SUBMISSION:	May 29, 2015
DATE OF RECEIPT:	May 29, 2015

This supplemental application proposes the following change: to provide comparability protocol as a PAS to support the qualification of a new working cell bank for manufacture of drug substance.

Unless we notify you within 60 days of the receipt date that the application is not sufficiently complete to permit a substantive review, we will file the application on July 29, 2015 in accordance with 21 CFR 601.2(a).

If the application is filed, the user fee goal date will be September 29, 2015.

SUBMISSION REQUIREMENTS

Cite the application number listed above at the top of the first page of all submissions to this application. Send all submissions, electronic or paper, including those sent by overnight mail or courier, to the following address:

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Biotechnology Products
5901-B Ammendale Road
Beltsville, MD 20705-1266

All regulatory documents submitted in paper should be three-hole punched on the left side of the page and bound. The left margin should be at least three-fourths of an inch to assure text is not obscured in the fastened area. Standard paper size (8-1/2 by 11 inches) should be used; however, it may occasionally be necessary to use individual pages larger than standard paper size. Non-standard, large pages should be folded and mounted to allow the page to be opened for review without disassembling the jacket and refolded without damage when the volume is shelved. Shipping unbound documents may result in the loss of portions of the submission or an unnecessary delay in processing which could have an adverse impact on the review of the submission. For additional information, see

<http://www.fda.gov/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/DrugMasterFilesDMFs/ucm073080.htm>.

You are also responsible for complying with the applicable provisions of sections 402(i) and (j) of the Public Health Service Act (PHS Act) [42 USC §§ 282 (i) and (j)], which was amended by Title VIII of the Food and Drug Administration Amendments Act of 2007 (FDAAA) (Public Law No, 110-85, 121 Stat. 904).

If you have questions, please contact me at (301) 796-2066 or Anita.Brown@fda.hhs.gov.

Sincerely,

Anita N.
Brown -S

Digitally signed by Anita N. Brown -S
DN: c=US, o=U.S. Government, ou=HHS,
ou=FDA, ou=People, cn=Anita N. Brown
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Date: 2015.07.06 15:32:50 -04'00'

Anita N. Brown
Regulatory Business Process Manager
Office of Program and Regulatory Operations
Office of Pharmaceutical Quality
Center for Drug Evaluation and Research