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Draft ICCVAM Test Method Recommendations:

Non-Radioactive LLNA: BrdU-FC

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13 **1.0 Draft Recommendations: Test Method Uses and Limitations**

14 *Background:* ICCVAM is currently evaluating the validation status of the LLNA: BrdU-
15 FC as a non-radioactive alternative to the traditional LLNA (i.e., ICCVAM 1999, Dean et
16 al. 2001) to identify substances that may cause allergic contact dermatitis (ACD). While
17 the traditional LLNA assesses cellular proliferation by measuring the incorporation of
18 radioactivity into the deoxyribonucleic acid (DNA) of dividing lymph node cells, the
19 LLNA: BrdU-FC assesses the same endpoint by measuring the incorporation of the
20 thymidine analog bromodeoxyuridine (BrdU). The incorporation of BrdU is measured
21 using flow cytometry. The LLNA: BrdU-FC also includes a routine assessment of ear
22 swelling as a measure of excessive irritation. Finally, the LLNA: BrdU-FC also includes
23 enhancements (referred to hereafter as the “eLLNA: BrdU-FC”), for substances with a
24 stimulation index (SI) ≥ 3 and with ear swelling $> 25\%$ that include assessment of
25 immunophenotypic markers to distinguish sensitizers from irritants (see **Section 2.0** of
26 the draft LLNA: BrdU-FC BRD). Additional information and discussion of the
27 evaluation of this test method are provided in the draft ICCVAM LLNA: BrdU-FC BRD
28 (ICCVAM 2007).

29 *Draft Recommendations:*

30 Based on the available database of 45 substances (26 sensitizers and 19 nonsensitizers
31 when tested in the traditional LLNA) and demonstrated performance (accuracy of 91%
32 [41/45], sensitivity of 100% [26/26], specificity of 79% [15/19]) compared to the
33 traditional LLNA, the LLNA: BrdU-FC may useful for identifying substances as
34 potential skin sensitizers and non-sensitizers. However, at this time, more information
35 and data are needed before a recommended use of the LLNA: BrdU-FC can be made.
36 Specifically:

- 37 • Three of the 45 substances produced an "equivocal" result¹ in the LLNA: BrdU-
38 FC, one of which has been commonly used as a positive control in the traditional
39 LLNA (2-mercaptobenzthiazole). One of the other equivocal substances is one of
40 the recommended reference standard sensitizers in the draft ICCVAM LLNA

¹ Equivocal is defined by MB Research Labs as multiple tests with the same substance that produce discordant results.

41 performance standards; in order for an assay like the LLNA: BrdU-FC to
42 demonstrate equivalence to the traditional LLNA, these draft performance
43 standards require complete concordance with the recommended sensitizers and
44 nonsensitizers. The rationale for the repeat testing of these substances and
45 possible reasons for the discordant results have been requested, but have not been
46 provided.

- 47 • There has not been an evaluation of interlaboratory reproducibility. This is critical
48 if this test method is to be accepted for use in laboratories other than that of the
49 test method developer.
- 50 • Original records have not been obtained for the studies included in this
51 evaluation. As a result, an independent audit could not be conducted to confirm
52 that the reported data is the same as the data originally recorded.

53 **2.0 Draft Recommendations: Test Method Protocol for the LLNA: BRDU-FC**

54 All aspects of the recommended ICCVAM LLNA test method protocol (ICCVAM 1999,
55 Dean et al. 2001) should be followed with the exception of the method used to assess
56 lymphocyte proliferation. Measurement of BrdU incorporation and total lymph node cell
57 number using flow cytometry (i.e., total number of lymphocytes in the test preparation
58 and the total number of cells with incorporated BrdU) is described in **Appendix A** of the
59 draft ICCVAM LLNA: BrdU-FC BRD. In addition, an assessment of ear swelling should
60 be routinely conducted to identify local irritation.

61 **3.0 Draft Recommendations: Future Studies**

- 62 • Further development of this test method is required to ensure that at least two
63 of the three equivocal substances provide reproducible results. This is needed
64 to meet the requirements of the draft ICCVAM LLNA performance standards
65 that mandate, in order for this test method to demonstrate equivalence to the
66 traditional LLNA, 100% concordance with the calls obtained in the
67 traditional LLNA.
- 68 • The “sequential strategy” used in the enhanced FC-LLNA protocol, which
69 incorporates immunophenotypic endpoints via flow cytometry to identify

70 potential false positives that are actually non-sensitizing skin irritants, should
71 be further investigated to more fully characterize its usefulness and
72 limitations for this purpose. Also, a thorough description of the
73 immunochemical phenotyping procedure (e.g., type and source of antibody)
74 should be provided.

- 75 • Prior to the use of this test method in other laboratories, the reference
76 substances (HCA and DNCB) recommended for intra- and inter-laboratory
77 reproducibility assessments in the ICCVAM draft performance standards
78 should be tested to determine if acceptable results can be obtained.
- 79 • The applicability of the LLNA: BrdU-FC to testing metals, mixtures, and
80 aqueous solutions (current limitations of the traditional LLNA) should be
81 further evaluated to determine if this method can be used to assess the ACD
82 potential of these types of substances.

83 **4.0 Draft Performance Standards**

84 Performance standards for the LLNA: BrdU-FC are not proposed at this time. However,
85 ICCVAM has developed draft performance standards for the traditional LLNA
86 (http://iccvam.niehs.nih.gov/methods/immunotox/llna_PerfStds.htm). These draft test
87 method performance standards are proposed to evaluate the performance of LLNA test
88 methods that incorporate specific protocol modifications to measure lymphocyte
89 proliferation compared to the traditional LLNA. ICCVAM does not anticipate the need to
90 develop separate performance standards for the LLNA: BrdU-FC.