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5.0 3T3 AND NHK NRU TEST METHOD DATA AND RESULTS

This section summarizes the IC_{50} results generated by testing 72 coded reference substances (see **Section 3**) in the 3T3 and NHK NRU test method protocols. These IC_{50} values were used to evaluate the accuracy (also known as concordance - see **Section 6**) of the two *in vitro* cytotoxicity test methods for predicting *in vivo* GHS acute oral toxicity categories and their reliability (intra- and inter-laboratory reproducibility - see **Section 7**). The individual test data for the passing and failing tests are provided in **Appendix I** for the reference substances and the PC. The raw data for each test (in EXCEL® and PRISM® files) are available upon request from NICEATM on compact disk(s), as are the laboratory reports. Requests can be made by mail, fax, or e-mail to Dr. William S. Stokes, NICEATM, NIEHS, P. O. Box 12233, MD EC-17, Research Triangle Park, NC, 27709, (phone) 919-541-2384, (fax) 919-541-0947, (e-mail) niceatm@niehs.nih.gov.

Section 5.1 discusses the timeline for the validation study, the study participants, and their roles in the study. **Section 5.2** documents the use of coded reference substances and the GLP compliance by the participating laboratories. **Section 5.3** discusses the protocol revisions that were made during the study and the effect the revisions had on the results. **Section 5.4** presents the IC_{50} data collected during each phase to assess the reliability and accuracy (relevance) of the NRU methods. **Section 5.5** presents the statistical analyses performed. **Section 5.6** summarizes the results of IC_{50} comparisons of the 3T3 and NHK methods. **Section 5.7** offers information about the availability of all the data (e.g., raw OD data from all tests, laboratory reports), and **Section 5.8** presents the solubility test results for the reference substances from all laboratories.

5.1 Study Timeline and Participating Laboratories

5.1.1 Statements of Work (SOW) and Protocols

The SMT provided the laboratories with SOWs for each test method prior to initiation of testing (see **Appendix G**), and proposed dates for completion of the various aspects of the study (e.g., transfer of data, provision of reports). The SOWs defined the following:

- Project objectives
- Management and key personnel
- Required facilities, equipment, and supplies
- Ouality assurance requirements
- Test phases and schedules
- Products (e.g., reports) required
- Report preparation

The SOW for BioReliance contained all of the above requirements, and also included requirements for:

- Reference substance acquisition, coding, preparation, and distribution
- Solubility testing

The SMT, in consultation with the laboratories, prepared Test Method Protocols for each phase of the study. Cytotoxicity testing in each phase of the validation study was initiated in each laboratory when the SMT received a signed protocol specific for that phase from the

Study Director. Solubility testing for the Phases I and II substances was performed prior to cytotoxicity testing for those substances; most of the solubility testing for the Phase III substances was performed toward the end of Phase II and during the early part of Phase III.

5.1.2 Study Timeline

The actual timeline of the study is shown in **Table 5-1**. The SMT modified the original timeline presented in the SOWs because of a number of factors, such as, protocol revisions, side studies, difficulties with acquisition of medium, etc.

Table 5-1 Validation Study Timetable

Abbreviations: ECBC=Edgewood Chemical Biological Center; FAL=Fund for the Replacement of Animals in Medical Experiments Alternatives Laboratory; IIVS=Institute for *In Vitro* Sciences; SOW=Statement of Work; SMT=Study Management Team; NA=Not applicable.

Note: BioReliance distributed the reference substances and performed solubility testing. ECBC, FAL, and IIVS tested the reference substances for solubility and *in vitro* cytotoxicity.

5.1.3 Participating Laboratories

- BioReliance Corporation 14920 Broschart Road Rockville, Maryland 20850-3349 Study Director: Dr. Martin Wenk
- U.S. Army Edgewood Chemical Biological Center (ECBC) Molecular Engineering Team Aberdeen Proving Ground, MD 21010 Study Director: Dr. Cheng Cao
- Institute for *In Vitro* Sciences (IIVS) 21 Firstfield Road Suite 220 Gaithersburg, MD 20878 Study Director: Mr. Hans Raabe
- Fund for the Replacement of Animals in Medical Experiments Alternatives Laboratory (FAL) Queens Medical Centre, University of Nottingham Nottingham NG7 2UH United Kingdom Study Director: Dr. Richard Clothier

5.2 Coded Reference Substances and GLP Guidelines

5.2.1 Coded Reference Substances

BioReliance acquired 73 substances (72 reference substances and one PC substance) from reputable commercial sources (see **Appendix F1**). All but eight of the reference substances were >99% pure (see **Section 8.1.2.1**). BioReliance coded each substance with a unique, random identification number when repackaging them into smaller units for distribution to the laboratories. These units were given an additional code unique to the respective cytotoxicity laboratories, so that they could be provided in a blinded fashion (see **Section 3.4** for distribution procedures). The coded substance units were packaged and shipped such that their identities were concealed; however, all laboratories knew the identity of the positive control. The SMT revealed the codes for each phase after all laboratories had submitted their data and reports for that phase. The laboratories periodically required additional aliquots of reference substance, and BioReliance provided these aliquots from the original stock of reference substance in the same manner that the original aliquots were provided.

5.2.2 Lot-to-Lot Consistency of Reference Substances

Each substance was purchased as a single lot, and each laboratory received aliquots from this same lot throughout the validation study. The reference substance suppliers provided certificates of analysis for each lot, along with the MSDS documents containing substance, physical, and safety and handling information.

5.2.3 Adherence to GLP Guidelines

BioReliance, ECBC, and IIVS, followed GLP procedures for all testing, with the exception of tests designed to resolve technical challenges (e.g., formation of NR crystals; use of film plate sealers for volatile substances; slow growth of cells). The laboratories submitted all data to their respective quality assurance units (as per GLP requirements) and copies of the data were submitted to NICEATM. FAL followed most of the GLP guidelines, but did not employ independent quality assurance reviews of laboratory procedures or documentation. The Study Director for FAL performed all data reviews and provided copies to NICEATM. Hard copy printouts and electronic versions of all data are available at NICEATM.

5.3 3T3 and NHK NRU Test Method Protocols

The protocols for the 3T3 and NHK NRU test methods used during Phase III laboratory testing were the result of modifications and revisions to the *Guidance Document* (ICCVAM 2001b) protocols, the optimization of the protocols used in the laboratory evaluation Phases Ia and Ib, and the laboratory qualification phase (Phase II) (see **Section 2.6**). **Figure 1-2**

provides an outline of the study phases, and identifies where repeated observations were carried out to permit protocol evaluation and comparison. **Sections 2.2** and **2.3** address the similarities and differences between the 3T3 and NHK protocols. The remaining subsections in **Section 5.3** address the modifications to the protocols used in each phase, and how those modifications affected each data set.

5.3.1 Phase Ia: Laboratory Evaluation Phase

During Phase Ia, each laboratory established an historical database for the PC substance, SLS. No reference substances were tested in this phase. Ten concentration-response tests were performed using SLS and no more than two tests were performed/day. The resulting data were used to calculate the acceptable response limits for the SLS IC_{50} for use during Phase Ib testing.

Section 2.6.1 summarizes issues that occurred during Phase I and addresses protocol changes made after the initiation of Phase Ia. The specific changes to the protocols for both cell systems are summarized below, along with the impact these changes had on the test data. Changes made in the protocols during Phase Ia were incorporated into the Phase Ib protocols.

5.3.1.1 *Protocol Changes and the Effect on the Data*

- *NR Dye Crystals:* Reduced the NR dye concentration for both cell types. No subsequent tests failed because of NR crystal formation. The background OD values decreased and this was not interpreted as a negative effect on the data.
- *3T3 Cell Growth*: Modified cell culture conditions for 3T3 cells to improve cell growth characteristics. No apparent effect on the data was detected.
- *NHK Cell Growth (96-well plates):* Removed the cell culture refeeding step performed prior to reference substance addition. Although the OD values for the vehicle controls became higher, the SLS IC_{50} results were similar whether or not the cells were re-fed.
- *NHK Cell Growth (in culture flasks)*: FAL coated their culture flasks with fibronectin-collagen prior to seeding thawed cells. This may have affected the SLS data from FAL because it had the highest SLS IC_{50} values of the three laboratories (7.45 µg/mL vs. 4.03 µg/mL for ECBC and 3.68 µg/mL for IIVS). The fibronectin-collagen coating procedure was eliminated, and subsequent SLS data and IC_{50} results from FAL were comparable to the data from the other two laboratories.
- *OD Limits*: Eliminated the VC OD range as a test acceptance criterion. The SMT decided to accept tests that had VC ODs outside the originally preset range if all other test acceptance criteria were met. Test data were not adversely affected by relaxing this criterion.
- *Dilution Factor*: The SMT accepted data generated using dilution factors other than the recommended 1.47 for definitive tests if all other test acceptance criteria were met. The use of smaller dilution factors generally increased the number of data points between 10 - 90% viability, and the precision of the IC_{50} calculation was improved.

5.3.2 Phase Ib: Laboratory Evaluation Phase

Phase Ib was designed to determine whether the protocol revisions following Phase Ia were effective in improving intra- and inter-laboratory reproducibility, and to determine whether

the laboratories could obtain reproducible results when testing coded reference substances of various toxicities. Three coded reference substances representing the full range of toxicity were tested: arsenic trioxide (high toxicity: $5 <$ LD₅₀ \leq 50 mg/kg), propranolol HCl (medium toxicity: $300 < L D_{50} \le 2000$ mg/kg), and ethylene glycol (low toxicity: $L D_{50} > 5000$ mg/kg) (see **Section 3.3.5** for the selection of substances to be tested in Phases Ib and II). Because Phase Ib was part of the laboratory evaluation phase, the SMT decided that three substances would be sufficient, and that it was not necessary to represent all GHS acute oral toxicity categories. Each substance was tested in all laboratories at least once in a range finding experiment, and then in three, acceptable definitive tests performed on three different days. **Section 2.6.2** summarizes the technical challenges that arose during this phase and addresses protocol changes made after initiation of Phase Ib. The specific changes made in the 3T3 and NHK protocols, along with the effect the changes had on the test data, are summarized below.

5.3.2.1 *Protocol Changes and the Effect on the Data*

- *NR Dye Crystals*: Reduced the concentration of NR in the 3T3 method. The OD values and SLS IC_{50} results were similar in four exploratory experiments regardless of the NR concentration or NRU incubation time. The elimination of NR crystals reduced the background OD values without affecting the sensitivity of the procedure.
- *VC OD Range*: Used new VC OD ranges for guidance (e.g., as target values to assess cell growth), rather than as a test acceptance criterion, for the remainder of the study. This increased the number of tests that met the acceptance criteria. Relative toxicities did not change. The test data were not adversely affected by the removal of this criterion.

5.3.3 Phase II: Laboratory Qualification Phase

The results from Phase II were used to determine whether the protocol revisions from Phase Ib were effective in improving intra- and inter-laboratory reproducibility, and whether the laboratories could obtain reproducible results when testing a larger set of substances covering a wider range of physical/substance characteristics and toxicities. Nine coded reference substances were tested: aminopterin, cadmium chloride, chloramphenicol, colchicine, lithium carbonate, potassium chloride, 2-propanol, sodium fluoride, and sodium selenate. These substances (with the exception of sodium selenate) are included in the RC, and were selected because they fit the RC millimole regression line (i.e., they were within the acceptance intervals established by Halle [1998, 2003]). The RC is a database of acute oral LD_{50} values for rats and mice obtained from RTECS[®] and IC_{50} values from *in vitro* cytotoxicity assays using multiple cell lines and cytotoxicity endpoints for substances with known molecular weights (Halle 1998, 2003). Sodium selenate was selected because of its high toxicity, despite the fact that it was not in the RC, because there were no other substances in the highest GHS acute oral toxicity category, other than aminopterin, that were within the RC millimole regression acceptance intervals. Each laboratory tested each substance at least once in a range finding experiment, and then in three acceptable definitive tests performed on different days.

Section 2.6.2 summarizes the technical issues that arose during this phase and the protocol changes made prior to Phase II. The specific changes made in the 3T3 and NHK NRU protocols, along with the effect the changes had on the test data, are summarized below.

5.3.3.1 *Protocol Changes and the Effect on the Data*

- *Blank Wells*: Added reference substance to blank wells of the test plate to determine if reference substance affected (i.e., increased OD values) compared to medium-filled blank wells. There was no apparent effect on the test data as there were no noticeable differences in OD values between blanks with culture medium or culture medium and reference substance.
- *VC OD Range*: Eliminated the VC OD range as an acceptance criterion. There was no apparent effect on test data from not restricting the OD values to a preset range.
- *Harmonization of Laboratory Techniques*: Made revisions to the Phase II protocols as a result of the harmonization training by the testing laboratories (see **Section 2.6.2.6**). There was no apparent effect on the test data from IIVS and ECBC, but there was an improvement in the FAL data quality (e.g., fewer lost OD values due to cell seeding errors, more uniform OD values for six replicate wells per reference substance).
- *3T3 Cell Seeding Density*: Added a range of cell seeding densities to be used by the laboratories. This optimized the cell confluence at the end of chemical exposure and no apparent effects on the data were detected because of this modification.
- *NHK Cell Growth from Cryopreserved Stock Cells*: Eliminated the use of fibronectin-collagen coating of 80-cm² flasks for the initial propagation of NHK cells. By doing this, FAL achieved better cell growth, lower IC_{50} values for the PC, and better agreement of the mean SLS IC_{50} values with those of the other laboratories.
- *Volatile Substances*: Added the use of a CO₂ permeable plate sealer to control volatility (as identified by cross contamination of the control wells). The use of plate sealers for volatile substances was incorporated into the Phase III protocols.
- R^2 *Acceptance Criterion*: Relaxed the R^2 criterion for the fit of the doseresponse data to the Hill function*.* Some tests that did not meet the original criterion were accepted by the SMT after determining that even though the curve fit was not optimum, it adequately conveyed the toxicity of the substance (i.e., an IC_{50} could be calculated with an adequate number of toxicity points between 0 and 100% viability).
- *Unusual Concentration-Response*: Revised the Hill function calculation to address substances that produced a concentration-response in which toxicity plateaued before reaching 0% viability. This modification allowed for a curve fit to the Hill function for such substances, and thus a better estimation of their IC_{50} values.
- *PC IC₅₀ Range*: Expanded the SLS IC₅₀ acceptable range, which resulted in additional tests in Phase II being acceptable. Expanding the PC range reduced the number of reference substance retests, and thereby qualified additional

definitive tests as acceptable because they would not fail simply because the PC was out of the pre-set range.

5.3.4 Phase III: Main Validation Phase

The purpose of Phase III was to generate high quality *in vitro* cytotoxicity data using the 3T3 and NHK NRU test methods with protocols that were optimized based on the experience and results in Phases I and II. Sixty coded reference substances were tested; 46 of these were RC substances that covered a broad range of toxicity. The reference substances in Phase III spanned all five GHS toxicity categories and unclassified substances. Each substance was tested in each laboratory at least once in a range finding experiment, and then in three acceptable definitive tests performed on different days.

Section 2.6.4 addresses protocol changes made before the initiation of Phase III. The specific changes made in the 3T3 and NHK protocols, along with the effect the changes had on the test data, are summarized below.

5.3.4.1 *Protocol Changes and the Effect on the Data*

- *Prequalification of NHK Culture Medium*: Included a protocol for prequalifying NHK culture medium and supplements. This prevented the participating laboratories from using medium and supplements that did not support adequate growth of the cells.
- *Stopping Rule for Testing*: Added this rule for reference substances that were insoluble (i.e., <200 µg/mL) and/or did not produce sufficient cytotoxicity for the calculation of an IC_{50} . This rule allowed testing to end for substances that produced no IC₅₀ data after three definitive tests. Substances for which an IC₅₀ was not produced by one or more laboratories are presented in **Table 5-2**. Carbon tetrachloride did not produce an IC_{50} in any of the laboratories in either the 3T3 or the NHK NRU test methods, and methanol did not produce an IC_{50} in the 3T3 NRU test method.
- *Acceptable Range for Dose-Response Data Points:* Modified the test acceptance criterion for the number of data points required on the toxicity curve. The criterion was changed from requiring a minimum of two points (at least one >0% and $\leq 50\%$ viability, and at least one >50% and $\leq 100\%$ viability) to one point >0% and <100% viability, if the smallest practical dilution factor (i.e., 1.21) was used, and all other test acceptance criteria were met. This reduced the number of failed experiments for substances with very steep concentration-response curves, without reducing the quality of the IC_{50} data. For the 3T3 NRU test method, diquat dibromide (1/9 definitive tests), epinephrine bitartrate (2/9 definitive tests), and 1,1,1-trichloroethane (2/8 definitive tests) had such steep dose-responses that some acceptable tests met these revised criteria. None of the NHK NRU tests needed the revised criteria.
- R^2 *Acceptance Criterion*: Rescinded the R^2 criterion for the fit of the Hill function. The SMT determined that the R^2 criterion was best used to characterize the shape of the concentration-response curve rather than to establish a criterion for test acceptability. This reduced the number of failed experiments without affecting the calculation of the IC_{50} values as long as an

adequate number of toxicity points between 0 and 100% viability were obtained.

- *PC Acceptance Criteria*: Modified the PC acceptance criterion for Hill function fit.
- *Hill Function Analysis*: Altered the PRISM® template for the Hill function analysis to perform calculations for IC_x values in two ways: (1) constraining Bottom parameter to zero, and (2) fitting the Bottom parameter. As a result of the changes and efforts by the laboratories to use dilution schemes that captured the entire concentration-response range, very few tests in Phase III had R^2 < 0.9.
- *Biphasic Dose-Response in Range Finder Test*: Provided guidance for proceeding with definitive testing when a biphasic dose-response was obtained in the range-finder test. The definitive test was to focus on the lowest concentrations that produced responses around 50% viability (See **Section 2.6.3.2**).

Table 5-2 Reference Substances Affected by Stopping Rule¹

Abbreviations: 3T3=BALB/c 3T3 fibroblasts; NHK=Normal human epidermal keratinocytes; NRU=Neutral red uptake; ECBC=Edgewood Chemical Biological Center; FAL=Fund for the Replacement of Animals in Medical Experiments Alternatives Laboratory; IIVS=Institute for *In Vitro* Sciences. ¹

¹Substances that did not provide sufficient cytotoxicity for the calculation of an IC_{50} in one or more laboratories (identified by X).

5.4 Data Used to Evaluate Test Method Accuracy and Reliability

This section first presents the acceptable PC data and IC_{50} results from each laboratory for each phase of the validation study, and then presents the reference substance IC_{50} results and Hill Slopes from each phase. The individual test data for both passing and failing tests are provided in **Appendix I** for the PC and reference substances. Accuracy (concordance for the prediction of GHS acute oral toxicity category) and reliability assessments are provided in **Sections 6** and **7**, respectively.

5.4.1 PC Data

A summary of the acceptable SLS data IC_{50} results used to calculate quality control acceptance limits for each test method in each laboratory are provided in **Table 5-3**. The SLS IC_{50} results were used to calculate acceptable limits for each laboratory to use in subsequent study phases. One of the test acceptance criteria for each reference substance test was that the associated SLS IC_{50} must be within the acceptance limits. The individual test data for both passing and failing PC tests are provided in **Appendix I3** for the 3T3 and in **Appendix I4** for the NHK methods.

Table 5-3 Positive Control (PC)1 IC50 Results by Study Phase

Abbreviations: 3T3=BALB/c 3T3 fibroblasts; NHK=Normal human epidermal keratinocytes; NRU=Neutral red uptake; ECBC=Edgewood Chemical Biological Center; FAL=Fund for the Replacement of Animals in Medical Experiments Alternatives Laboratory; IIVS=Institute for *In Vitro* Sciences; N=Number of acceptable tests; NA=Not applicable

 ${}^{1}PC$ was sodium lauryl sulfate (SLS). 1 PC was sodium lauryl sulfate (SLS).
 2 Values generated from Phase Ia data

Values generated from Phase Ia data were used as acceptance criteria for Phase Ib tests; Acceptance limits = Mean ± 2 X standard deviation.
³Values generated from Phases Ia and Ib data were used as acceptance criteri

³Values generated from Phases Ia and Ib data were used as acceptance criteria for Phase II tests; Acceptance limits = Mean \pm 2.5 X standard deviation.

⁴Values generated from Phases Ia, Ib, and II data were used as acceptance criteria for Phase III tests; Acceptance limits = Mean \pm 2.5 X standard deviation.

Values generated from Phase III test data.

⁶Calculation of lower limits yielded a negative value, so that lower limit was set at 0 and later revised to 0.1 µg/mL.

5.4.1.1 *Phase Ib PC Data Acceptance Limits*

The SLS IC_{50} acceptance limits for Phase Ib testing were calculated using the Phase Ia data. The data sets from each laboratory were examined for outliers using the method of Dixon and Massey (1981), but none were identified. The acceptance limits for the SLS IC_{50} values for each laboratory and test method were the mean ± 2 SD.

5.4.1.2 *Phase II PC Data Acceptance Limits*

The IC_{50} values from the Phase Ia and Ib SLS tests were used to calculate laboratory-specific and test method-specific quality control acceptance limits for Phase II. Phase Ib tests that had SLS IC₅₀ values outside of the acceptance limits were considered acceptable if they met all other test acceptance criteria. For any day during which there was more than one SLS test (for any one method and laboratory), the IC_{50} values were averaged to better reflect day-today variation and avoid overweighting the overall mean with multiple values from a single day. Outliers at the 99% level were removed and the remaining values were used to calculate the mean \pm 2.5 SD acceptance limits. The acceptance limits were expanded from 2 SD in Phase Ib to 2.5 SD for Phase II to allow for the fact that the SDs decrease as more data are collected.

5.4.1.3 *Phase III PC Data Acceptance Limits*

The IC_{50} values from the Phase I and II SLS tests were used to calculate laboratory-specific and method-specific quality control acceptance limits for Phase III data. The SLS IC_{50} values outside the acceptance limits were considered acceptable if the tests met all other acceptance criteria. For any day for which there was more than one SLS test (for any one method and laboratory), the IC_{50} values were averaged to better reflect day-to-day variation and avoid overweighting the overall mean with multiples values from a single day. ANOVA was used to compare the Phase Ia, Ib, and II data within each laboratory to determine whether the SLS IC_{50} for each method and laboratory was changing over the course of the study. For PC data that were not significantly different from phase to phase at $p \le 0.05$, the IC₅₀ values were used to calculate the mean ± 2.5 SD as the acceptance limits for Phase III. The only significant differences in SLS values seen between study phases ($p \le 0.0002$) were the FAL results for NHK. This difference was attributed to the changes in cell culture practices between Phases Ib and II (see **Section 5.3.3**). Thus, only the Phase II SLS IC_{50} values were used to calculate the acceptance limits for Phase III NHK data at FAL.

5.4.2 Reference Substance Data

Reference substance data and results from the individual 3T3 and NHK tests (both acceptable and unacceptable) from each laboratory are presented in **Appendices I1** and **I2**. **Tables 5-4** and $5-5$ summarize the IC_{50} and Hill Slope data from the acceptable 3T3 and NHK tests, respectively, for each reference substance and laboratory. The Hill Slope data are provided for supplemental information on the concentration-response characteristics for each reference substance, but were not used for reliability or accuracy analyses. These tables are organized alphabetically by substance name and provide substance class (based on the NLM Medical Subject Heading [MeSH index]), arithmetic mean IC_{50} and SD for each laboratory, arithmetic mean Hill Slope and SD for each laboratory, and the number of tests used to produce the mean values. **Figure 5-1** graphically presents the 3T3 IC₅₀ data from **Table 5-4**, and **Figure 5-2** presents the NHK IC₅₀ data from **Table 5-5**. The reference substances in **Figures 5-1** and **5-2** are ordered by ascending IC₅₀ (lowest value [most toxic] to highest value [least toxic]) using the 3T3 IC $_{50}$ values from IIVS (the lead laboratory for the study). This allows a simple

comparison of each reference substance value from each laboratory. **Table 5-6** provides the numerical key to the reference substances in **Figures 5-1** and **5-2**.

Because of their low toxicity and/or low solubility, some substances were not sufficiently toxic for calculation of an IC_{50} value. For the 3T3 NRU test method, no IC_{50} values were obtained for carbon tetrachloride or methanol in any laboratory (see **Table 5-4**). ECBC was the only laboratory that obtained IC_{50} values for lithium carbonate, and IIVS was the only laboratory that obtained IC_{50} values for xylene. Only one acceptable test (and IC_{50} value) was obtained for disulfoton at FAL, for 1,1,1-trichloroethane at ECBC, and for valproic acid at IIVS. FAL did not achieve sufficient toxicity for the calculation of an IC_{50} for gibberellic acid in any 3T3 NRU tests performed. For the NHK NRU test method (see **Table 5-5**), there was insufficient toxicity in all tests in all laboratories for a calculation of an IC_{50} for carbon tetrachloride. Only one laboratory achieved sufficient toxicity for the calculation of an IC_{50} for 1,1,1-trichloroethane (ECBC) and xylene (IIVS). One laboratory, ECBC, failed to achieve sufficient toxicity for the calculation of an IC_{50} for methanol. All of these substances, with the exception of methanol, produced precipitate in the cell culture medium. The solvent used for methanol was DMSO, and because the amount of DMSO that could be used in the cell culture was limited to 0.5%, the amount of DMSO that could be used to dissolve methanol was also limited. The differences among laboratories regarding their ability to attain a high enough concentration to achieve an IC_{50} for some substances may be due to the differing perceptions of the laboratory personnel regarding whether or not the substance was sufficiently dissolved, or differences in the techniques used to dissolve the substances.

Abbreviations: ECBC=Edgewood Chemical Biological Center; FAL=Fund for the Replacement of Animals in Medical Experiments Alternatives Laboratory; IIVS=Institute for *In Vitro* Sciences; SD=Standard deviation; N=Number of data points; NA=Not available (i.e., IC₅₀ values or Hill Slope values could not be generated [see notes in **Appendix I** for more information])

Arithmetic mean.

²Standard deviation of IC₅₀.
³Arithmetic Mean of Hill S1

³Arithmetic Mean of Hill Slope values.

4 Standard deviation of Hill Slope values.

⁵Chemical class assigned is based on the classification of the National Library of Medicine's Medical Subject Heading (MeSH)[, http://www.nlm.nih.gov/mesh/meshhome.html.](http://www.nlm.nih.gov/mesh/meshhome.html)

Abbreviations: ECBC=Edgewood Chemical Biological Center; FAL=Fund for the Replacement of Animals in Medical Experiments Alternatives Laboratory; IIVS=Institute for *In Vitro* Sciences; SD=Standard deviation; N=Number of data points; NA=Not available (i.e., IC₅₀ values or Hill Slope values could not be generated [see notes in **Appendix I** for more information])

Arithmetic mean.

²Standard deviation of IC₅₀.
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³Arithmetic Mean of Hill Slope values.

4 Standard deviation of Hill Slope values.

⁵Chemical class assigned is based on the classification of the National Library of Medicine's Medical Subject Heading (MeSH)[, http://www.nlm.nih.gov/mesh/meshhome.html.](http://www.nlm.nih.gov/mesh/meshhome.html)

Figure 5-1 **Reference Substance IC₅₀ Results for the 3T3 NRU Test Method by Laboratory**

Abbreviations: ECBC=Edgewood Chemical Biological Center; FAL=Fund for the Replacement of Animals in Medical Experiments Alternatives Laboratory; IIVS=Institute for *In Vitro* Sciences.

Points show the mean arithmetic IC₅₀ (μ g/mL) for each reference substance from each laboratory. Error bars show the standard deviation. Data were sorted in ascending order of 3T3 IC₅₀ values from IIVS (lead laboratory in the validation study). **Table 5-6** provides the numerical key for reference substance identification.

Figure 5-2 Reference Substance IC₅₀ Results for the NHK NRU Test Method by Laboratory

Abbreviations: ECBC=Edgewood Biological Center; FAL=Fund for the Replacement of Animals in Medical Experiments Alternatives Laboratory; IIVS=Institute for *In Vitro* Sciences.

Points show the mean arithmetic IC₅₀ (μ g/mL) for each reference substance from each laboratory. Error bars show the standard deviation. Data were sorted in ascending order of 3T3 IC50 values from IIVS (lead laboratory in the validation study). **Table 5-6** provides the numerical key for reference substance identification.

| N ₀ | Reference Substance | N ₀ | Reference Substance | N ₀ | Reference Substance | N ₀ | Reference Substance |
|----------------|---------------------------------|----------------|----------------------------|----------------|----------------------------|----------------|----------------------------|
| 1 | Aminopterin | 19 | Propylparaben | 37 | Strychnine | 55 | Citric acid |
| $\overline{2}$ | Triphenyltin hydroxide | 20 | Propranolol HCl | 38 | Phenylthiourea | 56 | Boric acid |
| 3 | Colchicine | 21 | Dichlorvos | 39 | Lindane | 57 | 5-Aminosalicylic acid |
| $\overline{4}$ | Cycloheximide | 22 | Potassium cyanide | 40 | Carbamazepine | 58 | Sodium hypochlorite |
| 5 | Triethylenemelamine | 23 | Physostigmine | 41 | Diethyl phthalate | 59 | Lactic acid |
| 6 | Sodium dichromate dihydrate | 24 | Dibutyl phthalate | 42 | Glutethimide | 60 | Potassium I chloride |
| τ | Sodium arsenite | 25 | Parathion | 43 | Chloramphenicol | 61 | 2-Propanol |
| 8 | Cadmium II chloride | 26 | Paraquat | 44 | Chloral hydrate | 62 | Sodium chloride |
| 9 | Hexachlorophene | 27 | Sodium selenate | 45 | Caffeine | 63 | Dimethylformamide |
| 10 | Mercury II chloride | 28 | Verapamil HCl | 46 | Digoxin | 64 | Ethanol |
| 11 | Endosulfan | 29 | Acetaminophen | 47 | Meprobamate | 65 | Gibberellic acid |
| 12 | Arsenic III trioxide | 30 | Busulfan | 48 | Acetylsalicylic acid | 66 | Acetonitrile |
| 13 | Diquat dibromide monohydrate | 31 | Sodium oxalate | 49 | Nicotine | 67 | 1,1,1-Trichloroethane |
| 14 | Haloperidol | 32 | Phenol | 50 | Phenobarbital | 68 | Ethylene glycol |
| 15 | Cupric sulfate pentahydrate | 33 | Disulfoton | 51 | Procainamide HCl | 69 | Glycerol |
| 16 | Thallium I sulfate | 34 | Epinephrine bitartrate | 52 | Valproic acid | 70 | Lithium I carbonate |
| 17 | Amitriptyline HCl | 35 | Atropine sulfate | 53 | Xylene | 71 | Carbon tetrachloride |
| 18 | Fenpropathrin | 36 | Sodium I fluoride | 54 | Trichloroacetic acid | 72 | Methanol |

Table 5-6 Key to Validation Study Reference Substances¹

Abbreviations: No=Number. 1 As used in **Figures 5-1** and **5-2**.

5.5 Statistical Approaches to the Evaluation of 3T3 and NHK Data

The statistical approaches used for data evaluation are reviewed in the following sections for each phase of the validation study. **Section 2.2.3** discussed the endpoint measurements for the 3T3 and NHK test methods. The OD values of each of six replicate wells ([minimum of four] in the 96-well plate) per test concentration (eight concentrations/reference substance or PC) were used to determine relative cell viability in relation to the mean VC OD on the same plate. The cell viability values calculated for the replicate wells for each concentration were used to determine the concentration-response curve (percent viability vs. log concentration) for each test. The IC_{50} value was determined from fitting the curve to a Hill function.

5.5.1 Statistical Analyses for Phase Ia Data

The laboratories reported the IC_{50} results for SLS in μ g/mL. The SMT used the results from the acceptable tests to calculate means and SDs for each method at each laboratory.

5.5.1.1 *Outlier Determination for Replicate Well Concentration Data*

A test for outliers at the 99% level (Dixon and Massey 1981) was used to determine the presence of outlier OD values among the six replicate wells for each reference substance concentration. The SMT applied the outlier test to the Phase Ia data when extreme values were noted. Outliers were excluded from the data set, and the IC_{50} was recalculated. The raw data files include all data provided by the laboratories, including the excluded outlier OD values. Because the protocol required a minimum of four acceptable test wells per reference substance concentration, no more than two wells of the six replicates could be excluded.

5.5.1.2 *Curve Fit Criteria*

After the completion of Phase Ia testing, a curve fit criterion was implemented for test acceptance following a visual review of the fit of the OD data to the Hill function curve. The SMT considered the fit of the concentration-response curve to the Hill function to be acceptable when $R^2 > 0.9$. A fit of $R^2 < 0.8$ was considered unacceptable and the data from that test were rejected. Curves with a fit of $0.8 < R^2 < 0.9$ were evaluated visually for goodness of fit and accepted if the SMT concluded that there were sufficient data points between 0 and 100% cytotoxicity, and a reasonable shape to the curve, to calculate a reasonably accurate IC_{50} value. Each test with a curve fit in this range was analyzed on a case-by-case basis, and no standard pass/fail criterion was developed. [Note: The use of a curve fit criterion was reevaluated in Phases Ib and II, and was eliminated as a test acceptance criterion for Phase III test results. An R^2 value ≥ 0.85 was maintained as a test acceptance criterion for the PC because its fit to the Hill function was well characterized.]

5.5.1.3 *Reproducibility Analyses for PC IC50 Values*

To evaluate reproducibility of the IC_{50} values for the PC for each test method, within and between the laboratories, the SMT considered the American Society of Testing and Materials (ASTM) Standard E691-99, *Standard Practice for Conducting an Interlaboratory Study to Determine the Precision of a Test Method* (ASTM 1999). This method uses two statistics, *h* and *k*, to judge the consistency of means and variances between laboratories. However, a minimum of six laboratories is required for this type of analysis and the SMT decided that it could not be appropriately applied to three laboratories. The variability of the PC IC_{50} results obtained from each test and laboratory was assessed using CV analysis and one-way ANOVA. Dividing the SD by the arithmetic mean IC_{50} value, and multiplying by 100 produced the CV. CV values were calculated for the acceptable tests within each laboratory to determine intralaboratory reproducibility. To compare the variation among laboratories, the CV was calculated using the arithmetic mean IC_{50} values from each of the three laboratories. Although no criterion for an acceptable CV was determined for this study, ECVAM recently used CV <30% as an acceptable range for both intra- and inter-laboratory reproducibility (Zuang et al. 2002; Fentem et al. 2001). Although CV <30% was intended to reflect an acceptable maximum for normal biological variability, the range was not supported by data.

For the ANOVA, IC_{50} values were first converted to mM units and then log-transformed to obtain normal distributions. One-way ANOVA was performed with SAS PROC GLM

software (SAS Institute 1999; see **Appendix D1** for example SAS code). A significance level of p <0.01 was used to test results between the laboratories in order to be conservative with respect to identifying laboratory differences.

5.5.2 Statistical Analyses of Phase Ib Data

5.5.2.1 *Outlier Determination for Replicate Well Concentration Data*

For consistency of replicate well concentration data, the SMT applied the same outlier test used for the Phase Ia data (Dixon and Massey 1981) when extreme OD values were noted. If the extreme value was an outlier at the 99% level, it was excluded from the data set, and the IC_{50} was recalculated. All data are available in the data files provided by the laboratories, including the excluded outlier OD values.

5.5.2.2 *Reproducibility Analyses of the Reference Substance IC50 Values*

One-way ANOVA and CV analyses were used to assess method reproducibility within and among laboratories. For the ANOVA, the IC_{50} values were first converted to mM units and then log-transformed to obtain normal distributions. One-way ANOVA was performed with SAS PROC GLM (SAS Institute 1999; see **Appendix D1** for example SAS code). A significance level of $p \le 0.01$ was used to test results between the laboratories in order to be conservative with respect to identifying laboratory differences. When the ANOVA detected significant differences among the laboratories, contrast analyses were performed to determine which laboratory was different from the others. These analyses compared the results of each laboratory with those of the other two laboratories. A significant difference in response among the laboratories was indicated by $p \le 0.01$.

CV values were calculated for each reference substance by dividing the SD by the arithmetic mean IC₅₀ value and multiplying by 100. CV values were calculated for the acceptable tests in each laboratory to determine intralaboratory reproducibility. To compare the variation among laboratories, the CV was calculated using the arithmetic mean IC_{50} values from each of the three laboratories.

As an additional approach to the assessment of interlaboratory reproducibility for each test substance, the maximum:minimum IC_{50} ratios (i.e., the maximum arithmetic mean laboratory IC_{50} value compared to the minimum arithmetic mean laboratory IC_{50} value) were calculated. This approach is similar to the calculation of maximum:minimum LD_{50} ratios for examining reproducibility of reference LD_{50} values (see **Section 4.4.1**).

5.5.3 Statistical Analyses of Phase II Data

5.5.3.1 *Outlier Determination for Replicate Well Concentration Data*

The Dixon and Massey (1981) outlier test was incorporated into the EXCEL[®] templates to assess the consistency of replicate well data for each reference substance concentration. Outliers at the 99% level were highlighted and the Study Director was offered the option of removing the value from subsequent calculations (e.g., mean OD of the six replicates; % viability; IC_{50}).

5.5.3.2 *Reproducibility Analyses of the Reference Substance IC50 Values*

The intra- and inter-laboratory reproducibility of the IC_{50} values were assessed using the acceptable tests to calculate the mean IC_{50} , SD, and CV for each substance, method, and laboratory, as described in **Section 5.5.2.2**. One-way ANOVAs and calculations of maximum:minimum IC₅₀ ratios were performed as described in **Section 5.5.2.2**.

5.5.3.3 *Comparison of 3T3 and NHK Test Results with the RC Millimole Regression* To compare the 3T3 and NHK test results for the reference substances to those of the RC millimole regression, each IC_{50} value was transformed to mM units for the calculation of geometric mean IC_{50} values. The use of geometric means corresponded with the approach used to obtain single IC₅₀ values from multiple IC₅₀ values for the RC millimole regression (Halle 1998, 2003). The log geometric mean IC_{50} values (in mM) of the 11 RC substances tested during Phases Ib and II (see **Table 3-8**) were used with the log RC LD₅₀ values, after transformation to log mmol/kg units (see **Appendices J1** and **J2**), to calculate least squares linear regressions for the data from each test method and laboratory. Each of these method/laboratory regressions was compared to the RC millimole regression using an F test with SAS PROC REG (SAS Institute 1999; see **Appendix D2** for example SAS code). An F test with a significance level of $p < 0.01$ was used to determine whether the joint comparison of slope and intercept indicated that the method/laboratory regressions were significantly different from the RC millimole regression.

As an alternate analysis, a least squares linear regression using IC_{50} and LD_{50} values from the RC was constructed for the 11 RC substances (*the RC-11 regression*) tested in Phases Ib and II. Each of these method/laboratory regressions was compared to the RC-11 regression using an F test with SAS PROC GLM (SAS Institute 1999; see **Appendix D2** for example SAS code) at a significance level of $p \le 0.01$. This was used to determine whether the comparisons of slope and intercept indicated that the laboratory regressions were significantly different from the RC-11 regression.

5.5.4 Statistical Analyses of Phase III Data

5.5.4.1 *Outlier Determination for Replicate Well Concentration Data*

The laboratories used the Dixon and Massey (1981) outlier test at the 99% level that was incorporated into the EXCEL® templates to test for outlier values among replicate well data at the different reference substance concentrations. The Study Director had the option of excluding the outliers from the data set, which were highlighted by the template, and subsequent calculations. All data are available in the data files provided by the laboratories, including the outlier OD values.

5.5.4.2 *Reproducibility Analyses of the PC IC50 Data*

A number of analyses were performed to determine whether the SLS IC_{50} values were reproducible across study phases. The SLS IC_{50} values used to access variability were different from those shown in **Table 5-3**. To get an assessment of the true variation of SLS IC₅₀ values, the reproducibility analyses included additional IC₅₀ values from SLS tests that did not meet the IC_{50} acceptance limits (see **Table 5-3**) for each laboratory and study phase if they passed all other test acceptance criteria. If more than one SLS test was performed on a single day (for any test method and laboratory), the IC_{50} values were averaged to determine a single IC_{50} for the day. This prevented multiple data values from a single day from overly influencing the mean for each phase. CV analyses were performed as described in **Section 5.5.1** using the arithmetic mean SLS IC_{50} values for each method, laboratory, and study phase.

For the remaining analyses of reproducibility, the IC_{50} values were first log-transformed to obtain normal distributions. One-way ANOVAs were performed with SAS PROC GLM (SAS Institute 1999; see **Appendix D1** for example SAS code) for each method using study phase and laboratory as individual variables. A significance level of $p \le 0.01$ was used to test for a statistical difference among the laboratory and/or phase results.

To determine whether there was a linear time trend for the SLS IC_{50} data, linear regression analyses using a least squares method were performed for each laboratory and method using SAS PROC REG (SAS Institute 1999). Time was expressed as an index for each test. The index number of each SLS test reflected its order of testing without respect to the time lapsing between tests. For example, the first SLS test was assigned a time index of 1 and the second SLS test was assigned a time index of 2 whether it occurred the day after the first test or one week after the first test. The slopes of the linear regressions were judged to be statistically significant at $p < 0.05$, which indicated that the IC_{50} had changed significantly over time.

5.5.4.3 *Reproducibility Analyses of the Reference Substance IC50 Values*

CV, one-way ANOVA analyses, and maximum: minimum IC_{50} ratios were performed to assess the intra- and/or inter-laboratory reproducibility of the Phase III reference substance data, as described in **Section 5.5.2.2**. An additional evaluation to determine whether normalizing the reference substance IC_{50} to the SLS IC_{50} would reduce interlaboratory variability was performed using five substances (for each test method) for which the ANOVAs indicated significant interlaboratory differences. The reference substance IC_{50} values were normalized to the SLS IC₅₀ by calculating the reference substance IC₅₀:SLS IC₅₀ ratio. CVs were calculated for each substance using the mean ratios from each laboratory. To determine whether this normalization reduced variability among the laboratories, the CVs for the substance IC_{50} :SLS IC_{50} ratios were compared to the CVs for the substance IC_{50} . In addition, the geometric mean IC_{50} values were used to calculate least squares linear regression models after log transforming the data. Linear regressions were fit for each method and laboratory using the log-transformed reference LD_{50} values from **Table 4-2** (in $mmol/kg$), with log IC_{50} in mM. To detect differences among the linear regressions in each laboratory, two models were fit for each method. The first was a full model that included effects for laboratory and interactions, and generated a regression line for each substance in each laboratory, by test method. The second model, which was considered to be a reduced model, assumed that one model fit all the laboratories. A goodness of fit F test was performed to compare the full and reduced models for each method. A significance level of p <0.01 was used to test whether the regressions among laboratories were significantly different from one another. The following criteria were established for selection of data for use in the regression analyses for each test method:

- The substance was included in the RC
- All three laboratories reported IC_{50} values
- There was an associated rat oral reference LD_{50} value (see **Table 4-2**)

There were 47 reference substances that fit these criteria for the 3T3 and 51 test substances that fit the criteria for the NHK test methods.

5.5.4.4 *Comparison of 3T3 and NHK Results with the RC Millimole Regression* To determine whether the IC_{50} values determined in the validation study were significantly different from the RC values, the laboratory-specific regression values for each method were combined using the geometric means of the laboratory-specific geometric mean IC_{50} values in mM and the reference LD_{50} in mmol/kg. Thus, there was one regression analysis with pooled laboratory data for the 3T3 NRU test method and another regression analysis (also with pooled data) for the NHK NRU test method. A third linear regression was calculated using the IC_{50} and LD_{50} values from the RC. The IC_{50} values and LD_{50} values were logtransformed for the regression calculations. The following criteria were established for the selection of substances to be used for the regression analyses:

- The substance was included in the RC
- All three laboratories reported IC_{50} values for both the 3T3 and NHK NRU test methods
- There was an associated rat oral reference LD₅₀ value (see **Table 4-2**)

Forty-seven substances met these criteria. Two models were fit for each test method to detect differences between the NRU regression and the 47 RC substance regression. The first regression model was a full model that included effects for the RC and the NRU regression, and generated one regression line each for the RC and the NRU test method. The second (reduced) model assumed that a single model fit the combined RC and NRU IC_{50} data. The RC regression for the 47 reference substances was compared to the combined laboratory regression for each NRU test method using an F test to simultaneously compare slopes and intercepts. The NRU regressions were statistically different from the RC regressions if $p < 0.01$.

To assess the accuracy of the NRU methods and the associated IC_{50} - LD_{50} regressions, a predicted LD_{50} was calculated for each reference substance using its laboratory geometric mean IC_{50} in two analyses:

- The RC rat-only millimole regression calculated from the 282 RC substances with rat LD_{50} values, using units of mM for the IC_{50} and mmol/kg for the LD_{50} (see **Section 6.4.2**)
- The RC rat-only weight regression calculated from the 282 RC substances with rat LD_{50} values, using units of μ g/mL for the IC₅₀ and mg/kg for the LD50 (see **Section 6.4.3**)

The LD_{50} values predicted from the regression analyses were used to predict GHS acute oral toxicity categories (see **Section 6.4**). The accuracy of the predictions was determined by calculating the proportion of substances for which the predicted GHS toxicity category matched the GHS toxicity category. The LD_{50} predictions from these regression models were also used to determine starting doses for acute systemic toxicity test simulations for the purpose calculating animal use and savings that would be achieved using the NRU test methods. The simulation modeling methods, and results from the UDP and ATC methods, are described in **Section 10**.

5.5.5 Summary of the Data Used for Statistical Analyses

Table 5-7 summarizes the number of substances that were tested and the number of substances used for the various analyses performed to determine the accuracy and reliability of the *in vitro* NRU test methods.

Table 5-7 Datasets Used for Validation Study Analyses¹

Abbreviations: RC=Registry of Cytotoxicity; 3T3=BALB/c 3T3 fibroblasts; NHK=Normal human epidermal keratinocytes; NRU=Neutral red uptake; NA=Not applicable. ¹Number of substances.

5.6 Summary of NRU Test Results

Table 5-8 shows the 3T3 and NHK IC_{50} values as geometric means of the geometric mean laboratory values, as a basis to compare the 3T3 and NHK NRU IC_{50} values for each reference substance. The substances in **Table 5-8** are organized by ascending 3T3 NRU IC_{50} values (as was done for **Figures 5-1** and **5-2**). For each method, the table provides the geometric mean IC_{50} (combined across laboratories) in μ g/mL, the ratio of the geometric mean IC₅₀ to the SLS IC₅₀, and the 3T3 IC₅₀:NHK IC₅₀ ratios. Geometric means were used for this comparison because they were used for both the IC_{50} and LD_{50} regression analyses (see **Sections 5.5.3.3**, 5.5.4.3, and 5.5.4.4). The 3T3 and NHK NRU IC₅₀ values were compared using the ratios of their geometric means. The IC_{50} values for each reference substance were also compared to the IC_{50} for SLS using the ratio of reference substance geometric mean IC_{50} to SLS geometric mean IC_{50} .

Table 5-8 Comparison of 3T3 and NHK NRU IC50 Geometric Means

Table 5-8 Comparison of 3T3 and NHK NRU IC50 Geometric Means

Abbreviations: 3T3=BALB/c 3T3 fibroblasts; NHK=Normal human epidermal keratinocytes; NRU=Neutral red uptake; SLS=Sodium lauryl sulfate; NA=Not available.

Reference substances are ordered by 3T3 NRU IC_{50} values.

¹Geometric mean IC₅₀ of the laboratory geometric mean values.

²Data available from only one laboratory.

³Data available from only two laboratories.

*Acceptable positive control (SLS) values from all study phases: N=293 for the 3T3 NRU and N=281 for the NHK NRU.

Table 5-8 shows that there are nine reference substances for which the 3T3 and NHK NRU IC₅₀ values differ by at least one order of magnitude (i.e., 3T3 IC₅₀:NHK IC₅₀ \leq 0.1 or \geq 10): aminopterin, triethylenemelamine, hexachlorophene, thallium sulfate, fenpropathrin, sodium oxalate, acetaminophen, digoxin, and 5-aminosalicylic acid. The IC_{50} values for SLS, also differed by slightly more than one order of magnitude in the two NRU test methods (41.7 µg/mL for 3T3 and 3.99 µg/mL for NHK). One test method was not more consistently sensitive (i.e., produced lower IC_{50} values) than the other for these nine reference substances. The 3T3 NRU test method was more sensitive than the NHK NRU test method for four of the nine substances: aminopterin, triethylenemelamine, sodium oxalate, and acetaminophen. The NHK NRU test method was more sensitive than the 3T3 NRU test method for five substances: hexachlorophene, thallium sulfate, fenpropathrin, digoxin, and 5-aminosalicylic acid. Despite the normalization procedure, the reference substance IC_{50} : SLS IC_{50} ratios for the two methods were still greater by at least one order of magnitude for six of the nine substances (aminopterin, triethylenemelamine, hexachlorophene, sodium oxalate, acetaminophen, and digoxin) and the order of magnitude difference increased for all six substances. A number of factors could potentially be responsible for these differences between the 3T3 and NHK NRU IC_{50} values:

- Cell culture conditions (i. e., the 3T3 treatment medium contains serum while the NHK treatment medium does not; differences in cell density in the treatment medium)
- Differences in sensitivity between the fibroblast cell line and primary keratinocytes
- Differences in sensitivity between human and mouse cells
- Differences in metabolic activity between the cell types

These factors may affect the results for some substances more than others. For example, a substance that binds to serum proteins would be less available to the 3T3 cells (which have serum in their growth medium) than to NHK cells (which are grown without serum). No additional testing was performed to investigate the differences between the 3T3 and NHK NRU IC_{50} values.

Two substances, digoxin and aminopterin, have IC_{50} values that differ by five orders of magnitude between the two NRU test methods. Digoxin was much more toxic to the NHK cells and aminopterin was more toxic to the 3T3 cells. Both substances are known substrates for organic anionic transporters (OAT) (ICCVAM 2006). Such transporters are important for *in vivo* toxicity responses in terms of the ability of challenge substances to be absorbed, reach target tissues, accumulate, or be excreted. The differential susceptibilities of the 3T3 and NHK cells may be explained by differential functioning of OAT between the cell types. Although species and tissue differences in OAT have been reported (Sekine et al. 2000; Miyazaki et al. 2004), the reason for these differential sensitivities is not known.

The 3T3 IC₅₀:NHK IC₅₀ ratios shown in **Table 5-8** were used to determine the frequency distributions shown in **Table 5-9.** These distributions indicate that the 3T3 and NHK NRU IC_{50} values were within one order of magnitude of each other for 85% of the reference substances (obtained by adding 38.9% and 45.8% for the $0.1 <$ IC₅₀ ratio \leq 1 and 1 < IC₅₀ ratio <10 ranges). Ninety-three percent of the reference substances have 3T3 and NHK NRU IC_{50} values within two orders of magnitude of each other (obtained by adding 4.2% each for the $10 \leq$ IC₅₀ ratio \leq 100 and $0 \leq$ IC₅₀ ratio \leq 0.1 ranges to the 85% above).

Abbreviations: 3T3=Neutral red uptake using BALB/c 3T3 fibroblasts; NHK= Neutral red uptake using normal human epidermal keratinocytes. Note: Compiled using reference substance data from **Table 5-7**.

Correlations of the mean IC_{50} values for the reference substances common to the RC database with the IC_{50} values (i.e., geometric mean of IC_{50} values obtained from the literature for various basal cytotoxicity endpoints and cell types) from the RC (Halle 1998, 2003) are shown in **Figure 5-3** (3T3 values) and **Figure 5-4** (NHK values). Although the validation study tested 58 RC substances in common with the RC, IC_{50} values were obtained for 56 substances using the 3T3 NRU test method and 57 substances using the NHK NRU test method. Spearman correlation analyses of the log-transformed IC_{50} data (in mM) indicated that the NRU IC₅₀ values were significantly correlated with the RC IC_{50x} values (p<0.001, for both the 3T3 and NHK NRU test methods). The Spearman correlation coefficient, r_s , was 0.93 for the 3T3 values and 0.86 for the NHK values.

Figure 5-3 RC IC50 Values vs 3T3 NRU IC50 Values for 56 Substances in Common

The diagonal line indicates the predicted values for a 1:1 correspondence. No IC_{50} values were obtained for carbon tetrachloride or methanol because of insufficient toxicity. The Registry of Cytotoxicity IC_{50} values are geometric means of IC₅₀ values obtained from the literature for various basal cytotoxicity endpoints and cell types.

Figure 5-4 RC IC₅₀ Values vs NHK NRU IC₅₀ Values for 57 Substances in Common

Abbreviations: RC=Registry of Cytotoxicity; NHK=Normal human epidermal keratinocytes; NRU=Neutral red uptake; r_s =Spearman correlation coefficient; n=Number of substances; mM=Millimolar. The diagonal line indicates the predicted values for a 1:1 correspondence. No IC_{50} values were obtained for methanol because of insufficient toxicity. The Registry of Cytotoxicity IC_{50} values are geometric means of IC_{50} values obtained from the literature for various basal cytotoxicity endpoints and cell types.

5.7 Availability of Data

All data were provided to the SMT as electronic files and paper copies. The laboratories also maintained copies of all raw data and the electronic files. The individual test data and IC_{50} results for both passing and failing tests are provided in **Appendix I** for the reference substances and the PC.

5.8 Solubility Test Results

A solubility protocol (see **Section 2-8** and **Appendix B3**) designed to identify the solvent that would provide the highest concentration of a reference substance for *in vitro* testing was evaluated. Each laboratory performed solubility tests on all reference substances. However, to avoid the use of different solvents by the laboratories when testing the same substance, which might increase the variability of the IC_{50} results among the laboratories, the SMT assigned the solvents to be used (see **Table 5-10**). The objectives of the solubility testing were to evaluate the utility and appropriateness of the solubility protocol, and to evaluate the concordance among laboratories in selecting the solvents for each of the 72 reference substances.

Abbreviations: 3T3=BALB/c 3T3 fibroblasts; NHK=Normal human epidermal keratinocytes; SMT=Study Management Team; ECBC=Edgewood Chemical Biological Center; FAL=Fund for the Replacement of Animals in Medical Experiments Alternatives Laboratory; IIVS=Institute for *In Vitro* Sciences; DMSO=Dimethyl sulfoxide; ETOH=ethanol; NT=Not tested.

Note: Table sorted by study phase and alphabetical by substance.

¹The solubility protocol used was different from that used by the testing laboratories.
²Solvents selected by the SMT for autotoxicity testing. The BioBoliance results were

²Solvents selected by the SMT for cytotoxicity testing. The BioReliance results were used to determine solvents for Phases I and II. Results from all laboratories were used to determine solvents for Phase III. 3T3 and NH were treated as a single solvent. If a substance insoluble in one medium, and not the other, and soluble in DMSO, then DMSO was selected for use with both cell types.

Used protocol in **Figure 2-7**. 4

⁴Dulbecco's Modification of Eagle's Medium.

 5 Keratinocyte Growth Medium (KGM® from CAMBREX Clonetics®).

The results were obtained using a deviation from the standard protocol.

Laboratories agreed on solvent. Laboratories did not agree on solvent. **bold** Protocol did not provide enough guideline information to select a single solvent.

5.8.1 Solubility Data

BioReliance evaluated the solubility of the reference substances, first in media, then in DMSO, and then in ETOH, at 400 and 200 mg/mL. Based on their experience, a solubility protocol was developed for the testing laboratories. This revised protocol required testing at lower concentrations, and use of the various solvents at concentrations that would be equivalent when applied to the cell cultures (see **Table 2-5**). The solubility flow chart (**Figure 2-7**) illustrates the tests for solubility in 3T3 and NHK medium, DMSO, and ETOH. **Table 5-10** provides the solubility test results.

5.8.2 Solubility and Volatility Effects in the Cytotoxicity Tests

The laboratories reported solubility results for the stock solutions of reference substance for each 3T3 and NHK test. Prior to the addition of the NR dye medium, the laboratories visually observed the test cultures and documented noticeable precipitate. **Table 5-11** illustrates the existence of solubility issues (in both the 3T3 and NHK NRU test methods) as evidenced by the observation of precipitates with some reference substances. **Sections 3.2.6** and **5.4.2** provide additional information on ability of the laboratories to achieve sufficient toxicity for the calculation of an IC_{50} in the presence of limited solubility. **Table 5-11** also notes the presence of volatility, as indicated by the use of film plate sealers during incubation.

Table 5-11 Reference Substances with Precipitate (PPT) and Volatility Issues¹

Table 5-11 Reference Substances with Precipitate (PPT) and Volatility Issues¹

Abbreviations: 3T3=BALB/c 3T3 fibroblasts; NHK=Normal human epidermal keratinocytes; NRU=Neutral red uptake; PPT=Precipitate. Note: Table sorted alphabetical by reference substance.

Results are based on at least one laboratory having precipitate or volatility issues with a substance. Volatility was denoted by the use of plate sealers during testing. 2X stock dilutions are prepared for each of 8 test substance concentrations. 1X plate dilutions are the result of diluting the 2X stock solutions with medium in the 96-well plates.

5.9 Summary

- The BioReliance, ECBC, and IIVS laboratories performed the 3T3 and NHK NRU tests in compliance with GLP guidelines.
- The quality and consistency of the reference substances was maintained during the study by the central purchase and distribution of individual lots of reference substances to the testing laboratories.
- Modifications and revisions made to the protocols during Phases I and II contributed to the optimization of the final protocols used in Phase III of the study. As a general rule, the protocol changes enhanced the performance of the methods and allowed more tests to meet the acceptance criteria.
- FAL improved the quality of its NHK data prior to Phase II testing by modifying the methods used to propagate the cells. Positive control IC_{50} data in Phases II and III from FAL more closely resemble the data from the other laboratories.
- Summary test data and IC_{50} results are presented in tabular and graphic formats. Comparisons of 3T3 NRU IC_{50} values to NHK NRU IC_{50} values show that the values for 85% of the reference substances are within one order of magnitude of each other. Digoxin and aminopterin yielded differences of up to five orders of magnitude when the IC_{50} values of the 3T3 and NHK NRU test methods were compared.
- Although each laboratory followed the same solubility protocol, they sometimes obtained different results. This may have been due to the subjective judgment of whether or not solubility was achieved. Additionally, the laboratories may have used solubility procedures that were beyond the level of detail in the solubility protocol.