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### ***In vivo* genetic toxicity assessments for nitrosamines**

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Some N-nitrosamines may be considered potent carcinogens in animals because metabolically activated N-nitrosamines may form stable DNA adducts that lead to mutations and initiation of cancer in animals. However, approximately 18% N-nitrosamines that have been tested in previous animal carcinogenicity studies show no indication of carcinogenic potential. Furthermore, the carcinogenic potencies for N-nitrosamines span about 4 orders of magnitude with TD50s overlapping non-nitrosamines that are not in the cohort of concern. The lifetime cancer bioassays in rodents are time- intensive and associated with high experimental costs. Assessment of *in vivo* genotoxicity in rodents to determine a robust point of departure is a practical surrogate for assessment of nitrosamines. Here we use NDEA as a case study to compare the sensitivities of three *in vivo* methodologies including the transgenic rodent assay (TGR), Duplex Sequencing (DS) and Comet assay in both Big Blue mice and rats. NDEA was administered to Big Blue® or wild type rodents at a wide range of doses to enable a robust dose-response analysis. Both comet and TGR assays detected significant increases in the genotoxicity of NDEA at doses of 1 and 3 mg/kg/day in the liver of rodents and the BMD ranges calculated from both assays are largely overlapping. The DS appears to be slightly more sensitive than TGR assay in detecting a statistically increase in MF in rat liver exposed to NDEA at dose of 0.1 mg/kg/day. However, none of the three *in vivo* assays detected a genotoxic effect caused by exposures to NDEA equal to or lower than 0.01 mg/kg/day, suggesting a no observed genotoxic effect level (NOGEL) could be observed for NDEA. Overall, this work shows that the results of both Comet and DS assays have a good agreement with the gold standard TGR assay in dose-response assessment of a well-studied N-nitrosamine and could be an excellent alternative for the assessment of nitrosamines *in vivo*.