

October 23, 2020

Carefusion, Inc. Nesli Karakaya Sr. Manager, Regulatory Affairs 120 S State College Blvd, Suite 100 Brea, California 92821

Re: K193088

Trade/Device Name: MaxZero<sup>TM</sup> Extension Sets with Needle-Free Connector(s)

Regulation Number: 21 CFR 880.5440

Regulation Name: Intravascular Administration Set

Regulatory Class: Class II

Product Code: FPA

Dated: September 22, 2020 Received: September 23, 2020

### Dear Nesli Karakaya:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. Although this letter refers to your product as a device, please be aware that some cleared products may instead be combination products. The 510(k) Premarket Notification Database located at <a href="https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm">https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm</a> identifies combination product submissions. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part

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801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803) for devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see <a href="https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products">https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products</a>); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <a href="https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems">https://www.fda.gov/medical-device-problems</a>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<a href="https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance">https://www.fda.gov/training-and-continuing-education/cdrh-learn</a>) and CDRH Learn (<a href="https://www.fda.gov/training-and-continuing-education/cdrh-learn">https://www.fda.gov/training-and-continuing-education/cdrh-learn</a>). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (<a href="https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice</a>) for more information or contact DICE by email (<a href="DICE@fda.hhs.gov">DICE@fda.hhs.gov</a>) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

for Payal Patel
Acting Assistant Director
DHT3C: Division of Drug Delivery and
General Hospital Devices,
and Human Factors
OHT3: Office of Gastrorenal, ObGyn,
General Hospital and Urology Devices
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

# DEPARTMENT OF HEALTH AND HUMAN SERVICES Food and Drug Administration

# **Indications for Use**

510(k) Number (if known)

Form Approved: OMB No. 0910-0120

Expiration Date: 06/30/2020 See PRA Statement below.

K193088
Device Name
MaxZero™ Extension Sets with Needle-Free Connector(s)
Indications for Use (Describe)
The MaxZero <sup>TM</sup> extension set with needle-free connector(s) is for single use only. The MaxZero <sup>TM</sup> extension set with needle-free connector(s) may be used for direct injection, intermittent infusion, continuous infusion or aspiration of drugs, blood and fluids.
Type of Use (Select one or both, as applicable)
Prescription Use (Part 21 CFR 801 Subpart D) Over-The-Counter Use (21 CFR 801 Subpart C)
CONTINUE ON A SEPARATE PAGE IF NEEDED.

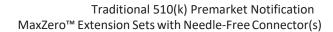
This section applies only to requirements of the Paperwork Reduction Act of 1995.

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K193088 **510(k) Summary** 

#### **Submitter Information**

**Submitter:** CareFusion, Inc.

120 S State College Blvd

Brea, CA 92821, USA

Contact Person:
Phone:
+41 21 556 3192
Email:
Nesli.Karakaya@bd.com
October 20, 2020

#### **Subject Device Identification**

**Trade Name:** MaxZero™ Extension Sets with Needle-Free Connector(s)

**Common Name:** Intravascular Administration Set Intravascular Administration Set

Classification Panel: General Hospital Regulation Number: 21 CFR 880.5440

**Regulatory Class:** Class II **Product Code:** FPA

### **Predicate Device Identification**

**Trade Name:** MaxZero™ Extension Sets with Needleless Connector

**Common Name:** Intravascular Administration Set **Classification Name:** Intravascular Administration Set

Classification Panel: General Hospital Regulation Number: 21 CFR 880.5440

Regulatory Class: Class II
Product Code: FPA

**Manufacturer:** Carefusion, Inc.

**510k Number:** K140831

**510K Clearance Date:** April 15, 2014

#### Reason for Submission

The objective of this submission is to introduce new components such as amber tubing that is resistant to UV light, trifurcated adaptors that connects 3 legs of tubing to a single male luer and filters that help prevent particles from flowing through the IV fluid line to the MaxZero<sup>TM</sup> Extension Sets with Needleless Connector(s).



#### **Device Description**

The MaxZero™ Extension Sets with Needle-Free Connector(s) are intravascular extension sets intended for single patient use, including pediatrics and immunocompromised patients, for direct injection, intermittent infusion continuous infusion or aspiration of drugs, blood and fluids. The MaxZero™ Extension Sets with Needle-Free Connector(s) are sterile single patient devices that can be used for up to seven (7) days and 200 activations. All extension sets included in this submission are not made from natural rubber latex or DEHP.

The following table lists the components that the device is comprised of.

Components	Description
MaxZero Needle-free	Needle-free connector used for the deliveryor aspiration of
Connector	drugs, blood and fluids to/from an IV catheter
Amber tubing	Delivers fluid to/from patient while blocking UV light
Filters	Filters out particulate
Slide Clamp	To close fluid path along tubing
Male Luer (spin lock)	Connects distal end of set to female luer
Bifurcated connectors (Y-connectors)	Merges two legs of tubing into single leg
Trifurcated adapter	Connects 3 legs of tubing to a single male luer

#### Indication for Use

The MaxZero<sup>™</sup> extension set with needle-free connector(s) is for single use only. The MaxZero<sup>™</sup> extension set with needle-free connector(s) may be used for direct injection, intermittent infusion, continuous infusion or aspiration of drugs, blood and fluids.

#### **Technological Characteristics**

The information provided in this premarket notification demonstrates that the subject MaxZero™ Extension Sets with Needle-Free Connector(s) is substantially equivalent to the legally marketed predicated device. The subject device and the predicate device are intended to be used for the delivery or aspiration of drugs, blood and fluids to/from an IV catheter in a hospital environment. The subject and predicate devices are similar in physical properties, materials, and configuration. Each device includes connectors that allow for needle-free access to the IV line during IV therapy eliminating the risk of needlestick injury. The subject device incorporates the MaxZero™ Needle-Free Connector attached to IV tubing. Components of the subject devices are made of materials that are substantially equivalent to those of the predicate device.



# **Proposed MaxZero Extension Sets**

Model Number	Description	Tubing	ID	OD
MZ9303	Microbore amber extension set, IV connector (70")	Microbore Amber	0.023"	0.079"
MZ9321	Microbore amber extension set, IV connector, 0.2 micron filter (81")	Microbore Amber	0.023"	0.079"
	Microbore quad-fuse extension set, 4 IV	Microbore Amber	0.023"	0.079"
MZ9299	connectors, 1 amber tubing lead, 3 clear tubing leads (7")	Microbore Clear	0.020"	0.079"
MZ9328	Minibore amber extension set, IV connector, 1.2 micron filter (81")	Minibore Amber	0.042"	0.079"

# **Substantial Equivalence Table**

	MaxZero™ Extension Sets with Needle-free Connector(s) (Subject Device)	CareFusion MaxZero™ Extension Sets with Needleless Connector (K140831)	Equivalence
FDA Reg. Number	21 CFR 880.5440	21 CFR 880.5440	Same
FDA Regulation Name	Intravascular Administration Set	Intravascular Administration Set	Same
FDA Class	Class II	Class II	Same
FDA Product Code	FPA	FPA	Same
Product Description	MaxZero™ Extension Sets with Needle-free Connector(s) and the predicate devices are sterile, single patient use, including pediatrics and immunocompromised patients for direct inject, intermittent infusion, continuous infusion or aspiration of drugs, blood and fluids	MaxZero™ Extension Sets with Needleless Connector and the predicate devices are sterile, single patient use, including pediatrics and immunocompromised patients for direct inject, intermittent infusion, continuous infusion or aspiration of drugs, blood and fluids	Same
Intended Use	The MaxZero™ Extension Set with Needle-free Connector(s) is a sterile single patient use device intended to be used for the delivery or aspiration	The MaxZero™ Extension Sets with Needleless Connector is a sterile single patient use device intended to be used for the delivery	Equivalent  Clarified delivery or aspiration of drugs, bloods and fluids. This is equivalent to



	I raditional 510(k) Premarket Notification  MaxZero™ Extension Sets with Needle-Free Connector(s)			
	MaxZero™ Extension	CareFusion MaxZero™	e-Free Connector(s)	
	Sets with Needle-free	Extension Sets with	Equivalence	
	Connector(s)	Needleless Connector	Equivalence	
	(Subject Device)	(K140831)		
	of drugs, blood and fluids	or aspiration of fluids	the device	
	to/from an IV catheter.	to/from an IV catheter.	description of the	
	to, ir oir arriv catriotor.	to/from an iv sameter.	predicate device.	
Indication for	The MaxZero™ extension	Pressure Rated: The	Equivalent to non-	
use	set with needle-free	MaxZero™ multi fuse	pressure rated sets	
	connector(s) is for single	extension set with		
	use only. The MaxZero™	needleless connector(s) is	The subject device is	
	extension set with needle-	for single use only. The	not indicated for	
	free connector(s) may be	extension set may be used	power injection. All	
	used for direct injection,	for direct injection,	subject devices are	
	intermittent infusion,	intermittent infusion,	non-pressure rated	
	continuous infusion or	continuous infusion or	sets.	
	aspiration of drugs, blood	aspiration. This set may be		
	and fluids.	used with power injector	Clarified delivery	
		procedures to a maximum	and/or aspiration of	
		pressure of 325 psi at a	drugs, bloods and	
		flow rate of 10mL per	fluids. This is	
		second.	equivalent to the	
		Non Dressure Dated	device description of	
		Non-Pressure Rated: The MaxZero™ multi fuse	the predicate device.	
		extension set with		
		needleless connector(s) is		
		for single use only. The		
		extension set may be used		
		for direct injection,		
		intermittent infusion,		
		continuous infusion or		
		aspiration.		
Device Length	• MZ9303	MZ5301 Pressure	Different	
	Microbore amber	rated extension		
	extension set, IV	set, MaxZero	New lengths added -	
	connector (70"	connector, slide	subject device has	
	Total Length)	clamp, spin male	the same intended	
	• MZ9321	luer lock (7" Total	use as the predicate	
	Microbore amber	Length)	device. Length	
	extension set, IV	MZ5301 Pressure	differences were	
	connector, filter	rated extension	tested according to	
	(81" Total	set, MaxZero	applicable consensus	
	Length)	connector, slide	standards (same as	
	MZ9299  Migral bara guad	clamp, spin male	the predicate	
	Microbore quad-	luer lock (7" Total	device).	
	fuse extension	Length)		
	set, 4 IV	MZ5304 Pressure     rated extension		
	connectors, 1 amber tubing	rated extension set, MaxZero		
	lead (7" Total	connector, slide		
	Length)	clamp, spin male		
		Summary	l .	



		MaxZero™ Extension Sets with Needle	e-Free Connector(s)
	MaxZero™ Extension	CareFusion MaxZero™	
	Sets with Needle-free	Extension Sets with	Equivalence
	Connector(s)	Needleless Connector	
	(Subject Device)	(K140831)	
	MZ9328 Minibore	luer lock (7" Total	
	amber extension	Length)	
	set, IV connector,	MZ5305 Pressure	
	filter (81" Total	rated extension	
	Length)	set, MaxZero	
	Length)		
		connector, spin	
		make luer lock (7"	
		Total Length)	
		MZ5306 Pressure	
		rated extension	
		set, minibore	
		tubing, MaxZero	
		connector, spin	
		make luer lock (7"	
		Total Length)	
		<ul> <li>MZ5307 Bi-fuse</li> </ul>	
		pressure rated	
		extension set,	
		minibore tubing,	
		(2) MaxZero	
		connectors, (2)	
		side clamps, spin	
		male luer lock. (7"	
		Total Length)	
		1470500 51 6	
		pressure rated	
		extension set,	
		minibore tubing,	
		(2) MaxZero	
		connectors, (2)	
		slide clamps, spin	
		make luer lock. (6"	
		Total Length)	
		<ul> <li>MZ9284 Bi-fuse</li> </ul>	
		pressure rated	
		extension set,	
		minibore tubing,	
		(2) MaxZero	
		connectors, (2)	
		check valves (2)	
		slide clamps, spin	
		make luer lock (7"	
		Total Length)	
		MZ9285 Bi-fuse	
		pressure rated	
		extension set,	
		minibore tubing, (2)	
		MaxZero connectors,	



characteristics of the

MaxZero™ Extension Sets with Needle-Free Connector(s) MaxZero™ Extension CareFusion MaxZero™ **Sets with Needle-free Extension Sets with** Equivalence Connector(s) **Needleless Connector** (Subject Device) (K140831) (2) check valves (2) slide clamps, spin make luer lock (7" Total Length) Fluid Contacting **Needle-free Connector: Needle-free Connector:** Different Material Polycarbonate, silicone Polycarbonate, silicone rubber Composition rubber **New Materials Tubing:** Non DEHP PVC **Tubing:** Non DEHP PVC included in subject Bi-F Connector: Rigid Bi-F Connector: Rigid PVC device: PVC Back Check Valve: ABS, Acrylic, Filter Media. Tri-F Connector: Acrylic silicon rubber Design Control Male Luer (Spinlock): Male Luer Adapter: ABS activities have been Male Spinlock: ABS conducted and have Amber Tubing: Non Female Luer: Copolyester confirmed the **DEHP PVC** different Filters: Acrylic, Filter technological Media characteristics of the proposed device do not raise different questions of safety and effectiveness Different Configurations MaxZero Needle-free MaxZero Needleless Connector, PVC tubing Connector, tubing of with various length and various length and ID/OD, New Components ID/OD, clear tubing, back check valve, slide included in subject amber tubing, in-line clamps, pinch clamps, Y device: connectors, male spin lock filters of various sizes. Amber tubing, slide clamps, male luer and female wing adapter filters, trifurcated (spin lock), female luer depending on configuration adaptor. Design (female wing adapter), Control activities bifurcated connectors (Yhave been conducted connectors) and and have confirmed trifurcated adapter the different technological characteristics of the proposed device do not raise different questions of safety and effectiveness Different **Physical** Up to quad-fuse extension Up to 2-piece extension set. Specification set. Lengths from 6" to Average length 7" 81" Design Control activities have been conducted and have confirmed the different technological



MaxZero™ Extension Sets with Needle-Free Connector(s)

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Max7ero™	<sup>1</sup> Extension	Sets with	Needle-Free	Connector(s)

	I	MaxZero : Extension Sets with Need	nie-Free Connector(s)
	MaxZero™ Extension	CareFusion MaxZero™	Familian
	Sets with Needle-free	Extension Sets with	Equivalence
	Connector(s)	Needleless Connector	
	(Subject Device)	(K140831)	
			questions of safety
			and effectiveness
No natural	Yes	Yes	Same
rubber latex			
Sterilization	E-Beam	E-Beam	Same
Method			
Biocompatibility	ISO 10993-1	ISO 10993-1	Same
Non-Pyrogenic	Yes	Yes	Same
Usable Life	Up to 7 days 200	7 days 200 activation	Equivalent
	activation		
			Clarification added
			for up to 7 days
Disinfect with	Disinfect with 70%	Disinfect with 70%	Same
70% Isopropyl	Isopropyl Alcohol	Isopropyl Alcohol	
Alcohol			
Performance			
Priming Volume	0.7mL - 2.0mL	Avg. 0.66 mL – 0.99 mL	Different
Triming volume	2.01112	7.vg. 0.00 m2 0.77 m2	Birerent
			Design Control
			activities have been
			conducted and have
			confirmed the
			different
			technological
			characteristics of the
			proposed device do
			not raise different
			questions of safety
			and effectiveness
Vacuum	-2.9 psi vacuum	-3.0 psi vacuum	Different
Integrity			
			Design Control
			activities have been
			conducted and have
			confirmed the
			different
			technological
			characteristics of the
			proposed device do
			not raise different
			questions of safety
			and effectiveness
Maximum	30 psi non-pressure rated	45 psi non-pressure rated	Different
Pressure	sets	sets	
			Subject device
			requirement has
			requirement has been aligned with



Max7ero™	<sup>1</sup> Extension	Sets with	Needle-Fre	e Connector(s)

	MaxZero™ Extension Sets with Needle-free Connector(s) (Subject Device)	CareFusion MaxZero™ Extension Sets with Needleless Connector (K140831)	Equivalence
			ISO 8536 which specifies 30 psi (200 kPa)
Shelf Life	1 Year	3 Years	Equivalent
Tubing Transparency (Clear Tubing)	Pass	Pass	Same
Light Resistance (Amber Tubing)	Blocks a minimum of 90% of UV light at any wavelength between 250-450 nm	N/A	New component added: Amber tubing  Design Control activities have been conducted and have confirmed the different technological characteristics of the proposed device do not raise different questions of safety and effectiveness

# **Explanation of Similarities and Differences technological Characteristics compared to Predicate Device**

The Subject MaxZero™ Extension Sets with Needle-Free Connector(s) have the following similarities to the predicate devices:

- Same Intended Use and Indication for Use
- Principle of operation
- Device Design
- Zero Reflux Needleless Connector
- Needle-free connector can be disinfected with 3 sec scrub with 70% IPA
- Maximum clinical use of up to 7 days 200 activations for the needleless connector (single patient use)
- Non-hemolytic and Non-pyrogenic
- Not made with DEHP and not made with natural latex rubber
- Sets tested to be used with harsh infusates

The following are technical characteristics differences between the subject and predicate devices:

 The subject device includes amber tubing that is resistant to UV light 510(K) Summary



Traditional 510(k) Premarket Notification MaxZero™ Extension Sets with Needle-Free Connector(s)

- The subject device includes filters that help prevent particles from flowing through the IV fluid line
- The subject device has new materials
- The subject device includes trifurcated adaptor that provides multi-fuse set with both amber and clear tubing
- The subject device includes mini bore tubing and different bonding agent
- The subject device includes different in priming volume, Vacuum Integrity, Maximum pressure and Shelf life
- The subject device offers new lengths

Design Control activities have been conducted and have confirmed the different technological characteristics of the proposed device do not raise different questions of safety and effectiveness.

#### **Discussion of Performance Data:**

#### Non-Clinical Data

CareFusion performed design verification performance testing to verify, demonstrate and support the claim of substantial equivalence to the predicate devices. All test results met their acceptance criteria and support that the MaxZero™ Extension Sets with Needle-free Connector are appropriately designed for their intended use.

Carefusion performed design verification performance testing according to the FDA recognized/voluntary consensus standards and guidelines.

- ISO 594-1:1986 Conical fittings with a 6% (luer) taper of syringes, needles, and certain other medical equipment Part 1: General requirements"
- ISO 594-2:1998 Conical fittings with 6%(luer) taper for syringes, needles, and certain other medical equipment Part 2 Locking fittings
- ISO 8536-4:2010 "Infusion equipment for medical use- Part 4: Infusion set for single use, gravity feed"
- ISO 8536-8:2015 "Infusion equipment for medical use Part 8: Infusion equipment for medical use. Infusion equipment for use with pressure infusion apparatus"
- ISO 8536-9: 2015 "Infusion equipment for medical use Part 9: Fluid lines for single use with pressure infusion equipment"
- ISO 8536-10: 2015 "Infusion equipment for medical use Part 10: Accessories for Fluid lines for single use with pressure infusion equipment"
- ISO 8536-11: 2015 "Infusion equipment for medical use Part 11 Infusion filters for use with pressure infusion equipment"
- ISO 14971: 2016 "Medical devices- Application of risk management to medical devices"
- Guidance for Industry and FDA Staff Intravascular Administration Sets Premarket Notification Submission [510(k)], July 11, 2008
- USP <788> "Particulate Matter in Injections"

The following tests were conducted according to the above standards:



# Traditional 510(k) Premarket Notification MaxZero™ Extension Sets with Needle-Free Connector(s)

- Leakage
- Separation Force
- Unscrewing Torque
- Ease of Assembly
- Resistance to Overriding
- Stress Cracking
- Particulate Contamination
- Tensile Strength
- Tubing: air/water interface only, not applicable to sets with light blocking tubing
- Fluid Filter
- Male Conical Fitting
- Protective Caps
- Chemical Requirements
- Biological Requirements

# **Biocompatibility**

Biocompatibility assessments were conducted in accordance with ISO-10993-1:2009, "Biological evaluation of medical devices – part 1: Evaluation and testing within a risk management process," Carefusion performed the biocompatibility testing of the components and finish product according to the following parts of the ISO 10993 standard.

- ISO 10993-2:2006: "Biological evaluation of medical devices part 2: Animal welfare requirements"
- ISO 10993-4: 2002: "Biological evaluation of medical devices part 4: Selection of tests for interactions with blood"
- ISO 10993-5: 2009: "Biological evaluation of medical devices part 5: Tests for in vitro cytotoxicity"
- ISO 10993-10: 2010: "Biological evaluation of medical devices part 10: Tests for irritation and delayed-type hypersensitivity"
- ISO 10993-11: 2006: "Biological evaluation of medical devices part 11: Test for systemic Toxicity"
- ISO 10993-12: 2012: "Biological evaluation of medical devices part 12: Sample preparation and reference materials"

#### Sterilization and Shelf life

The subject MaxZero™ Extension Sets with Needle-Free Connector(s) device is radiation sterilized and the shelf life data supports a shelf life claim of 1 year. Sterilization and shelf life testing were completed according to the following FDA recognized standards:

• ISO 11137-1: 2006 "Sterilization of health care products - Radiation- Part 1: Requirements for development, validation and routine control of a sterilization process for medical devices"



Traditional 510(k) Premarket Notification MaxZero™ Extension Sets with Needle-Free Connector(s)

- ISO 11137-2: 2006 "Sterilization of health care products Radiation Part 2 Establishing the sterilization dose"
- ISO 11607-1: 2006 "Packaging for terminally sterilized medical devices Part 1: Requirements for materials, sterile barrier systems, and packaging systems"
- ASTM F1980-07: 2002 "Standard Guide for Accelerated Aging of Sterile Barrier Systems for Medical Devices"
- ASTM F1140: 2000 "Standard Test Method for Burst Testing of Flexible Package Seals Using Internal Air Pressurization within Restraining Plates"
- ASTM D4169: 1998 "Standard Practice for Performance Testing of Shipping Containers and Systems"
- ASTM-F1929-98(04): 1998 "Standard Test Method for Detecting Seal Leaks in Porous Medical Packaging by Dye Penetration"

In addition to the above testing performed according to the ISO standards, the following performance testing was also conducted:

- UV Light Resistant: Test for light resistant ability of tube
- Flow Testing: Testing for flow of microbore and minibore tubing
- Clamps: Internal Excess Pressure and Tubing Open Fluid Path Testing
- Peak Pressure testing: Internal fluid peak pressure testing
- Priming volume testing: Priming volume is measured to have an approximate average of priming volume.
- Harsh Infusates testing: Device tests for multiple days with worst case infusates
- Air Water Interface Visibility (Clear Tubing)
- Microbial Ingress

#### **Clinical Data**

There are no clinical data included in this submission.

#### Conclusion

The subject MaxZero™ Extension Sets with Needle-Free Connector(s) met all predetermined acceptance criteria for functional, microbial ingress, sterility, biocompatibility, and other performance testing. Results of this testing demonstrate that the subject device is substantially equivalent to the predicate device.