

April 1, 2022

iRay Technology Taicang Ltd.
% Junjie Qian
Registration & Regulation Affairs Engineer
No. 33 Xinggang Rd.
Taicang Port Economic Technological Development Zone
Taicang, Jiangsu 215434
CHINA

Re: K220668

Trade/Device Name: Wireless Digital Flat Panel Detector

Regulation Number: 21 CFR 892.1680 Regulation Name: Stationary X-Ray System

Regulatory Class: Class II Product Code: MQB

Dated: November 11, 2021 Received: March 7, 2022

#### Dear Mr. Junjie Qian:

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 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>). 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</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,

Laurel Burk, Ph.D.
Assistant Director
Diagnostic X-ray Systems Team
Division of Radiological Health
OHT7: Office of In Vitro Diagnostics
and Radiological Health
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: 06/30/2023 See PRA Statement below.

K220668			
Device Name Wireless Digital Flat Panel Detector			
Indications for Use (Describe) Wireless digital flat panel detector is indicated for digital imaging solutions designed to provide general radiographic diagnosis for human anatomy including both adult and pediatric patients. It is intended to replace film/screen systems in all general—purpose diagnostic procedures. The device is not intended for mammography or dental applications.			
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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[510(k)] Application

# 510 (k) SUMMARY OF SAFETY AND EFFECTIVENESS

(As Required by 21 CFR 807.92)

#### 1. <u>Date Prepared [21 CFR 807.92(a)(1)]</u>

November 11, 2021

# 2. Submitter's Information [21 CFR 807.92(a)(1)]

**Company Name:** iRay Technology Taicang Ltd.

**Company Address:** No.33 Xinggang Road, Taicang Port Economic and

Technological Development Zone, Jiangsu, China 215434

**Contact Person:** Junjie Qian

**Phone:** 0512-53690872 **Fax:** 0512-53690872

**Email:** junjie.qian@iraygroup.com

## 3. Trade Name, Common Name, Classification [21 CFR 807.92(a)(2)]

<u>Trade Name:</u> Wireless Digital Flat Panel Detector

**Common Name:** Solid State X-Ray Imager

Model Name: Mars1013X

**Classification Name:** Stationary X-Ray System

**Product Code:** MQB

**Regulation Number:** 21 CFR 892.1680

**Device Class:** Class II

### 4. <u>Identification of Predicate Device(s) [21 CFR 807.92(a)(3)]</u>

The identification predicates within this submission are as follows:

**Manufacturer:** iRay Technology Taicang Ltd.

**Trade Name:** Wireless Digital Flat Panel Detector

**Model Name:** Mars1417X

**Product Code:** MQB

**Classification Name:** Stationary X-Ray System

**Regulation Number:** 21 CFR 892.1680

<u>Device Class</u>: Class II

**FDA 510 (k) #:** K210316

## 5. <u>Identification of Reference Device(s) [21 CFR 807.92(a)(3)]</u>

**Manufacturer:** iRay Technology Taicang Ltd.

**Trade Name:** Wireless Digital Flat Panel Detector

**Model Name:** Mars1717XF-CSI

**Product Code:** MQB

Classification Name: Stationary X-Ray System

**Regulation Number:** 21 CFR 892.1680

<u>Device Class:</u> Class II

**FDA 510 (k)** #: K183713

#### **6.** Description of the Device [21 CFR 807.92(a)(4)]

Mars1013X Wireless Digital Flat Panel Detector (Hereinafter referred to as Mars1013X) is the kind of wireless digital flat panel detector. It supports the single frame mode, with the key component of TFT/PD image sensor flat panel of active area: 33.18cm×25.28cm

The sensor plate of Mars1013X is direct-deposited with CsI(Cesium Iodide) scintillator to achieve the conversion from X-ray to visible photon. The visible photons are

transformed to electron signals by diode capacitor array within TFT panel, which are composed and processed by connecting to scanning and readout electronics, consequently to form a panel image by transmitting to PC through the user interface. The major function of the Mars1013X is to convert the X-ray to digital image, with the application of high resolution X-ray imaging. Both kinds of detectors are the key component of DR system, enable to complete the digitalization of the medical X-ray imaging with the DR system software.

iRay SDK(include iDetector) is intended to supply API interface for DR system manufacturers. DR system manufacturer control the detector by SDK interface. SDK is not intend to be used directly by other users beside DR system manufacturers.

#### 7. Intended Use [21 CFR 807.92(a)(5)]

#### 7.1. Indications for use

Mars1013X wireless digital flat panel detector is indicated for digital imaging solutions designed to provide general radiographic diagnosis for human anatomy including both adult and pediatric patients. It is intended to replace film/screen systems in all general–purpose diagnostic procedures. The device is not intended for mammography or dental applications.

#### **6.2.** Suitable patient

It is suitable for providing digital X-ray imaging for DR system to provide general radiographic diagnosis for human anatomy including both adult and pediatric patients, but not intended for mammography or dental applications. The remaining notes depend on the DR system.

#### 6.3. Processing of input and output

When flat panel detector works continuously, it can automatically distinguish X-ray and output an imaging for diagnosis of disease, injury, or of any applicable health problem.

# 8. Technological Characteristic [21 CFR 807.92(a)(6)]

Item	Predicate Device:	Proposed Device:	Reference Device:
	Mars1417X	Mars1013X	Mars1717XF-CSI
	Wireless Digital Flat	Wireless Digital Flat	Wireless Digital
	Panel Detector	Panel Detector	Flat Panel Detector
510(K) Number	K210316	K220668	K183713
	Mars1417X Wireless		
	Digital Flat Panel		
	Detector is indicated		
	for digital imaging		
Intended Use	solution designed for	Same	Same
	providing general		
	radiographic system in		
	all general-purpose		
	diagnostic procedures.		
-	Mars1417X wireless	Same	Same
	digital flat panel		
	detector is indicated		
	for digital imaging		
	solutions designed to		
	provide general		
Indications for Use	radiographic diagnosis		
	for human anatomy		
	including both adult		
	and pediatric patients.		
	It is intended to		
	replace film/screen		
	systems in all general-		
	purpose diagnostic		

# iRay Technology Taicang Ltd.

Item	Predicate Device:	Proposed Device:	Reference Device:
	Mars1417X	Mars1013X	Mars1717XF-CSI
	Wireless Digital Flat	Wireless Digital Flat	Wireless Digital
	Panel Detector	Panel Detector	Flat Panel Detector
	procedures. The		
	device is not intended		
	for mammography or		
	dental applications.		
Classification	Stationary X-ray	Same	Same
Name	system	Same	Same
Product Code	MQB	Same	Same
Regulation	21 CFR 892.1680	Same	Same
Number	21 CFK 892.1080	Same	
Panel:	Radiology	Same	Same
Classification:	II	Same	Same
X-Ray Absorber	CsI	Same	Same
(Scintillator):	CSI		
Installation Type:	Wireless, Portable	same	Same
Readout	Thin Film Transistor	Sama	C
Mechanism:	Tilli Filli Transistor	Same	Same
Image Matrix	2500 × 4200 pivals	$3318 \times 2528$ pixels	$2832 \times 2836$ pixels
Size:	$3500 \times 4300$ pixels		
Pixel Size:	100μm	100μm	150μm
ADC Digitization	16 bit	Same	Same
Effective Imaging	350.0 mm × 430.0 mm	331.8 mm × 252.8 mm	424.8 mm × 425.4
Area:			mm
Spatial	Min 4 3ln/mm	Min. 4.3lp/mm	Min. 3.3lp/mm
Resolution:	Min. 4.3lp/mm		

Item  Modulation Transfer Function (MTF)	Predicate Device: Mars1417X Wireless Digital Flat Panel Detector  0.65 at 1 lp/mm	Proposed Device: Mars1013X Wireless Digital Flat Panel Detector  Min. 0.60 at 1 lp/mm	Reference Device: Mars1717XF-CSI Wireless Digital Flat Panel Detector  0.49 at 1 lp/mm
Detective Quantum Efficiency (DQE) Power	0.54 at 1 lp/mm (RQA5, 2.5μGy)	Min. 0.43 at 1 lp/mm (RQA5, 2.5μGy)	0.40 at 1 lp/mm (RQA5, 2.5μGy)
Consumption:	Max. 19W	Max. 18W	Max. 20W
Communications: (Wireless functionality)	a) Wired (only for service): Gigabit Ethernet (1000BASE-T) b) Wireless: IEEE 802.11a/b/g/n/ac (2.4 GHz / 5 GHz)	a) Wired (only for service): Gigabit Ethernet (1000BASE-T) b) Wireless: IEEE 802.11a/b/g/n/ac (2.4 GHz / 5 GHz)	Wireless: IEEE 802.11a/b/g/n (2.4 GHz / 5 GHz)
Imaging protect Plate:	Carbon Fiber Plate	Same	Same
Cooling:	Air cooling	Same	Same
Dimensions:	384 mm × 460 mm × 15 mm	362.1 mm × 269.2 mm × 15.5 mm	460 mm × 460mm × 15 mm

	Predicate Device:	Proposed Device:	Reference Device:
Item	Mars1417X	Mars1013X	Mars1717XF-CSI
	Wireless Digital Flat	Wireless Digital Flat	Wireless Digital
	Panel Detector	Panel Detector	Flat Panel Detector
Detector IP grade	IP56	IPX5	IPX4
-	adapter port input:	adapter port input :	adapter port input :
	24Vdc 1.46A	24Vdc 0.75A	24Vdc 1.25A
Power input	Battery port input:	Battery port input:	Battery port input:
	11.55Vdc 1.6A	11.55Vdc 1.6A	7.6Vdc 3500mAh
Surface pressure	Uniform load: 300 kg over the whole area of the surface; Local load: 150 kg on an area 4 cm diameter of center	Uniform load: 150 kg over the whole area of the surface; Local load: 100 kg on an area 4 cm diameter of center	Uniform load: 150 kg over the whole area of the surface; Local load: 100 kg on an area 4 cm diameter of center
Operation:	Temperature: +10 ~ +35 °C Humidity: 5 ~ 90% (Non-Condensing) Atmospheric pressure: 70 ~ 106 kPa Altitude: Max. 3000 meters	Temperature: +10 ~ +35 °C Humidity: 5 ~ 90% (Non-Condensing) Atmospheric pressure: 70 ~ 106 kPa Altitude: Max. 3000 meters	Temperature: +5 ~ +30 °C Humidity: 10 ~ 80% (Non-Condensing) Atmospheric pressure: 70 ~ 106 kPa Altitude: Max. 3000 meters

	Predicate Device:	Proposed Device:	Reference Device:
Item	Mars1417X	Mars1013X	Mars1717XF-CSI
	Wireless Digital Flat	Wireless Digital Flat	Wireless Digital
	Panel Detector	Panel Detector	Flat Panel Detector
			Temperature: -20 ~
	Temperature: -20 ~	Temperature: -20 ~	+50°C
	+55℃	+55℃	Humidity: 10 ~
Storage and	Humidity: 5 ~ 95%	Humidity: 5 ~ 95%	90%
Transportation:	(Non-Condensing)	(Non-Condensing)	(Non-Condensing)
(detector)	Atmospheric pressure:	Atmospheric pressure:	Atmospheric
(detector)	60 ~ 106 kPa	60 ~ 106 kPa	pressure: 70 ~ 106
	Altitude: Max. 3000	Altitude: Max. 3000	kPa
	meters	meters	Altitude: Max.
			3000 meters
	SDK(include		
	iDetector) is intend to		
	supply API interface		
	for DR system		
	manufacturers. DR	Same	Same
Software	system manufacturer		
Software	control the detector by		
	SDK interface. SDK is		
	not intend to use		
	directly by other users		
	beside DR system		
	manufacturers.		

#### 9. System requirements to operate with other radiographic system components

#### 9.1. Recommended Generator Specification:

Energy range: 40~150kVp

service office.

mA range: 10~1000mA (depending on the generator power)

ms range: 10~6300ms to produce 0.1~1000mAs (depending on the generator power) Note: To our best knowledge, the detector is compatible with the X-ray generators with the specifications described above. If you have any questions regarding the compatibility issue for other generators, please contact the distributor or iRay's

9.2. Application Program Interface (API) for system integration manufacturer Peripheral hardware: Mars1013X connected via wireless communication.

Operating System: Windows 10, 32/64bit

CPU: Intel Core i7 3.6G

Memory: 8G DDR3

Hard Disk: 640 G

LAN Card: Intel Pro EXP9301CT PRO

Gigabit Network Adapter with PCIe interface

#### 9.3. X-ray exposure mode

The AED trigger module is a unit can connect X-ray signal in the Mars1013X. Once there is X-ray generator exposure exist, the AED trigger module will detect the X-ray radiation and output signal to the detector. Until the exposure finished, the detector will receive a signal which represent the end of exposure from the inner trigger module and begin to acquire the image.

#### 10. Substantial Equivalence [21 CFR 807.92(b)(1) and 807.92(b)(2)]

## 10.1. Electrical Safety and EMC testing:

Electrical, mechanical, environmental safety according to IEC/ES 60601-1 and IEC 60601-2-54 was performed, and EMC testing was also conducted in accordance with IEC 60601-1-2. All test results are meet the standard requirements.

## 10.2. Biological Evaluation:

The materials of the detector which contact operators' or patient's skin have been evaluated with the ISO 10993-1. And the evaluation results and test result assured the safety the same as the predicate device.

#### 10.3. Non-clinical Considerations:

One main modification from the predicate device is Amorphous Silicon (a-Si) panel size design, related to Amorphous Silicon (A-Si) panel size. Another main modification is structure design with different IP grade and different surface pressure performance.

The non-clinical studies have been performed and the results have shown that sections of the non-clinical consideration mentioned in the 'Guidance for the Submission of 510(k)s for Solid State X-ray Imaging Devices' are substantially equivalent to the non-consideration of predicate devices on the Market (Mars1417X, K210316).

#### 10.4. Clinical Consideration:

Intended use, fundamental scientific technology, regulatory requirement, non-clinical performance, labeling, quality-assurance program and software keep the same with those of predicate device. Additionally, as mentioned in clinical considerations in 'Guidance for the Submission of 510(k)s for Solid State X-ray Imaging Devices', clinical consideration may not necessary for changes in the dimensions of the image receptor with otherwise identical materials if non-clinical information is sufficient to support the substantial equivalence.

# 11. Conclusion [21 CFR 807.92(b)(3)]

In accordance with the *Federal Food, Drug and Cosmetic Act, 21 CFR Part 807* and based on the information provided in this premarket notification, iRay Technology Taicang Ltd. concludes that Mars1013X is substantially equivalent to predicate device with regards to safety and effectiveness.