

July 27, 2022

Owens & Minor (O&M) Halyard, Inc. Anureet Singh Regulatory Affairs Specialist II 9120 Lockwood Blvd Mechanicsville, Virginia 23116

Re: K214007

Trade/Device Name: HALYARD ONE-STEP Sterilization Wrap, HALYARD QUICK CHECK

Sterilization Wrap

Regulation Number: 21 CFR 880.6850 Regulation Name: Sterilization Wrap

Regulatory Class: Class II Product Code: FRG

Dated: June 29, 2022 Received: June 30, 2022

## Dear Anureet Singh:

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,

for Clarence W. Murray, III, Ph.D.
Acting Assistant Director
DHT4B: Division of Infection Control
and Plastic Surgery Devices
OHT4: Office of Surgical
and Infection Control 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

Form Approved: OMB No. 0910-0120

Expiration Date: 06/30/2023
See PRA Statement below.

510(k) Number (if known) K214007

Device Name
HALYARD\* ONE-STEP\* Sterilization Wrap and
HALYARD\* QUICK CHECK\* Sterilization Wrap

#### Indications for Use (Describe)

HALYARD ONE-STEP and QUICK CHECK Sterilization Wraps are intended to enclose another medical device that is to be sterilized by a healthcare provider using the Stryker Sterizone VP4 Sterilizer Cycle 1.

The HALYARD ONE-STEP and QUICK CHECK Sterilization Wraps are intended to allow sterilization of the enclosed devices by the Stryker Sterizone VP4 Sterilizer Cycle 1. All models of the Halyard ONE-STEP and QUICK CHECK Sterilization Wrap have been validated for use with the Stryker Sterizone VP4 Sterilizer Cycle 1 as described below:

Type of Device	HALYARD ONE-STEP* and QUICK CHECK* Validation Loads Description in the Stryker Sterizone VP4 Sterilizer Cycle 1	Validated Sterilization Wrap Grades <sup>B</sup>
General instru <mark>ment</mark> s		
Rigid channel instruments	Load #4 <sup>A</sup> - Consisted of 15 lumens from rigid and semi-rigid channeled devices. The load included:  • Three (3) double channel (six (6) lumens) semi-rigid endoscopes (ureteroscope - 0.7 mm × 500 mm and 1.1 mm × 500 mm) were packaged in three (3) sterilization trays including appropriate silicone brackets.  • Additional rigid channel instruments (nine (9) lumens) were added.  Testing was performed with trays wrapped in H400 and H600 sterilization wrap.	H400 <sup>c</sup> H500 H600 <sup>c</sup>
Single and double channel flexible endoscopes	Load #8 <sup>A</sup> - Consisted of five (5) lumens from single and double channel flexible endoscopes. The load included:  Two (2) double channel flexible endoscopes (ureteroscope) with inside diameter of 1 mm and lengths of 850 mm and 989 mm;  One (1) single channel flexible endoscope (ureteroscope) with inside diameter of 1 mm and length of 850 mm;  The endoscopes were individually packaged in sterilization trays, including appropriate silicone brackets.  Testing was performed with trays wrapped in H400 and H600 sterilization wrap.	H400 <sup>c</sup> H500 H600 <sup>c</sup>
Multi-channel flexible endoscopes	Load #9 <sup>A</sup> - Consisted of one (1) multichannel flexible endoscope with four (4) channels.  The load included:  One (1) multi flexible endoscope (colonoscope) with no more than four (4) channels having inside diameter of 1.2 mm and lengths of 1955 mm or inside diameter of 1.45 mm and lengths of 3500 mm, packaged individually in a sterilization tray.  Testing was performed with trays wrapped in H400 and H600 sterilization wrap.	H400 <sup>c</sup> H500 H600 <sup>c</sup>

A: Representative Sterizone® VP4 Sterilizer Cycle 1 Validation Load from K172191. B: HALYARD\* ONE-STEP\* and QUICK CHECK\* Sterilization Wrap are comprised of two sheets of Halyard Sequential Sterilization Wrap ultrasonically bonded together on two sides. Therefore, these grades are applicable to HALYARD\* ONE-STEP\*, QUICK CHECK\* and Sequential Sterilization Wrap. C: Indicates the bracketed grades for validation testing.

Type of Use (	Select one or bot	th. as applicable)
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Over-The-Counter Use (21 CFR 801 Subpart C)

#### CONTINUE ON A SEPARATE PAGE IF NEEDED.

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### 510(k) Summary – K214007

Submitter: O&M Halyard, Inc.

> 9120 Lockwood Boulevard Mechanicsville, VA 23116

Phone: 804-723-7000/800-488-8850

Fax: 804-723-7100

**Regulatory Contact:** Anureet Singh

Regulatory Affairs Specialist II

O&M Halvard, Inc. 1 Edison Drive Alpharetta, GA 30005

Date of Summary: 25 July 2022

HALYARD\* ONE-STEP\* Sterilization Wrap and HALYARD\* QUICK CHECK\* Device Trade Name:

Sterilization Wrap

Common Name: Sterilization Wrap

Classification Name: Sterilization wrap (21 CFR 880.6850, Product Code FRG)

Predicate Device: Halyard ONE-STEP Sterilization Wrap, K192147

Halyard Sterilization Wrap is supplied to the customer as bulk packages of single Device Description:

> sheets, where in accordance with standard hospital practices, two sheets are then used to wrap a medical device or a collection of medical devices for sterilization. HALYARD ONE-STEP and HALYARD QUICK CHECK Sterilization Wraps are comprised of two sheets of HALYARD\* Sequential Sterilization Wrap ultrasonically seamed on two edges. This allows for convenient wrapping with

two sheets simultaneously.

Sterilization wrap is a square or rectangular sheet made of three-layer SMS (spunbond-meltblown-spunbond) polypropylene fabric treated with an antistatic treatment. The wrap allows a sterilized package to be opened aseptically.

The HALYARD ONE-STEP and QUICK CHECK Sterilization Wraps are intended to enclose another medical device that is to be sterilized by a healthcare provider using the Stryker Sterizone VP4 Sterilizer Cycle 1 which is a dualsterilant, low temperature sterilizer that uses vaporized hydrogen peroxide (H<sub>2</sub>O<sub>2</sub>) and ozone (O<sub>3</sub>) in a single cycle. All models of the Halyard ONE-STEP and QUICK CHECK Sterilization Wrap have been validated for use with the Stryker

Sterizone VP4 Sterilizer Cycle 1 as described below.

Indication for Use: HALYARD ONE-STEP and QUICK CHECK Sterilization Wraps are intended

to enclose another medical device that is to be sterilized by a healthcare provider

using the single cycle Stryker Sterizone VP4 Sterilizer Cycle 1.

The HALYARD ONE-STEP and QUICK CHECK Sterilization Wraps are intended to allow sterilization of the enclosed devices by the Stryker Sterizone

VP4 Sterilizer Cycle 1. All models of the Halyard ONE-STEP and QUICK CHECK Sterilization Wrap have been validated for use with the Stryker Sterizone VP4 Sterilizer Cycle 1 as described below:

Type of Device	HALYARD ONE-STEP* and QUICK CHECK* Validation Loads Description in the Stryker Sterizone VP4 Sterilizer Cycle 1	Validated Sterilization Wrap Grades <sup>B</sup>
General instruments	Load consisted of three (3) trays each containing three (3) lb of general medical instruments. The load included:  • General devices representing the following geometries:  Box-lock hinge Pivot hinge Luer-lock  Testing was performed with trays wrapped in H100 sterilization wrap.  Load #7^A – Consisted of three (3) trays each containing 25 lb of general medical instruments, for a total of 75 lb per load (excluding the loading rack). The load included:  • General devices representing the following geometries:  Box-lock hinge Pivot hinge Luer-lock  Testing was performed with trays wrapped in H600 sterilization wrap.	H100 <sup>c</sup> H200 H300 H400 H500 H600 <sup>c</sup>
Rigid channel instruments	Load #4 <sup>A</sup> - Consisted of 15 lumens from rigid and semi-rigid channeled devices. The load included:  Three (3) double channel (six (6) lumens) semi-rigid endoscopes (ureteroscope - 0.7 mm × 500 mm and 1.1 mm × 500 mm) were packaged in three (3) sterilization trays including appropriate silicone brackets.  Additional rigid channel instruments (nine (9) lumens) were added.  Testing was performed with trays wrapped in H400 and H600 sterilization wrap.	H400 <sup>c</sup> H500 H600 <sup>c</sup>
Single and double channel flexible endoscopes	diameter of 1 mm and lengths of 850 mm and 989 mm;  One (1) single channel flexible endoscope (ureteroscope) with inside diameter of 1 mm and length of 850 mm;  The endoscopes were individually packaged in sterilization trays, including appropriate silicone brackets.  Testing was performed with trays wrapped in H400 and H600 sterilization wrap.	H400 <sup>c</sup> H500 H600 <sup>c</sup>
Multi-channel flexible endoscopes	Load #9 <sup>A</sup> - Consisted of one (1) multichannel flexible endoscope with four (4) channels.  The load included:  One (1) multi flexible endoscope (colonoscope) with no more than four (4) channels having inside diameter of 1.2 mm and lengths of 1955 mm or inside diameter of 1.45 mm and lengths of 3500 mm, packaged individually in a sterilization tray.  Testing was performed with trays wrapped in H400 and H600 sterilization wrap.	Н400 <sup>с</sup> Н500 Н600 <sup>с</sup>

A: Representative Sterizone® VP4 Sterilizer Cycle 1 Validation Load from K172191. B: HALYARD\* ONE-STEP\* and QUICK CHECK\* Sterilization Wrap are comprised of two sheets of Halyard Sequential Sterilization Wrap ultrasonically bonded together on two sides. Therefore, these grades are applicable to HALYARD\* ONE-STEP\*, QUICK CHECK\* and Sequential Sterilization Wrap. C: Indicates the bracketed grades for validation testing.

# Technological Characteristics Comparison Table:

	Proposed	<u>Predicate</u>	<u>Same</u>
	HALYARD ONE-STEP and	HALYARD ONE-STEP	Similar, or
	QUICK CHECK Sterilization Wrap	Sterilization Wrap	<b>Different</b>
	(K214007)	(K192147)	
Manufacturer	O&M Halyard, Inc.	O&M Halyard, Inc.	Same
Device Model	H100	H100	Same
Numbers	H200	H200	
	H300	H300	
	H400	H400	
	H500	H500	
	H600	H600	
Common or	Sterilization Wrap	Sterilization Wrap	Same
Usual Name	21 CED 000 (050	21 CFD 990 (950	C
Classification	21 CFR 880.6850	21 CFR 880.6850	Same
Class	II	II	Same
Product Code	FRG	FRG	Same
Indication for	HALYARD ONE-STEP and QUICK	The Halyard ONE-STEP Sterilization	Different
Use	CHECK Sterilization Wraps are	Wraps are intended to allow	
	intended to enclose another medical	sterilization of the enclosed devices by	
	device that is to be sterilized by a	the Sterilucent HC 80TT Hydrogen	
	healthcare provider using the Stryker	Peroxide Sterilizer (ie, both the Lumen	
	Sterizone VP4 Sterilizer Cycle 1.	and Flexible Cycles) Additionally, the	
	The HALYARD ONE-STEP and	Halyard ONE-STEP Sterilization	
	QUICK CHECK Sterilization Wraps	Wrap was validated to allow effective	
	are intended to allow sterilization of	aeration under the pre-programmed	
	the enclosed devices by the Stryker	HC 80TT Sterilization Cycles. All	
	Sterizone VP4 Sterilizer Cycle 1. All	models of the Halyard ONE-STEP	
	models of the Halyard ONE-STEP and	Sterilization Wrap have been validated	
	QUICK CHECK Sterilization Wrap	for use with the Sterilucent HC 80TT	
	have been validated for use with the Stryker Sterizone VP4 Sterilizer Cycle	Hydrogen Peroxide Sterilizer cycles as described below.	
	1 as described below:	Lumen Cycle	
	i as described below.	Reusable metal and nonmetal devices	
	Type of Device: General instruments	including devices with diffusion-	
	HALYARD ONE-STEP* and QUICK	restricted spaces such as the hinged	
	CHECK* Validation Loads Description in	portion of forceps and scissors and up	
	the Stryker Sterizone VP4 Sterilizer Cycle	to fifteen (15) stainless steel lumens	
	1:	per load with the following	
	Load consisted of three (3) trays each	dimensions:	
	containing three (3) lb of general medical	Single or dual channeled rigid and	
	instruments. The load included general	semi-rigid endoscopes, with stainless	
	devices representing the following geometries: Box-lock hinge, Pivot hinge,	steel lumens that are	
	Luer-lock.	$\geq$ 0.77 mm internal diameter (ID) and	
	Testing was performed with trays wrapped	$\leq$ 410 mm long, or $\geq$ 1.33 mm ID and $\leq$	
	in H100 sterilization wrap.	430 mm long;	
	Load #7 <sup>A</sup> – Consisted of three (3) trays	and, Triple channeled rigid and semi-	
	each containing 25 lb of general medical	rigid endoscopes, with stainless steel	
	instruments, for a total of 75 lb per load	lumens that are $\geq 1.00$ mm ID and $\leq$	
	(excluding the loading rack). The load	310 mm long (Refer to the HC 80TT	
	included general devices representing the	User Manual for complete instructions	
	following geometries: Box-lock hinge,	on load(s) and cycle(s), including	
	Pivot hinge, Luer-lock. Testing was performed with trays wrapped	chamber loading instructions (i.e. 20.1	
	in H600 sterilization wrap.	lb per load)	
		Flexible Cycle	
		Fiexible Cycle	

Validated Sterilization Wrap Grades<sup>B</sup>: H100<sup>C</sup>, H200, H300, H400, H500, H600<sup>C</sup>

Type of Device: Rigid channel instruments

HALYARD ONE-STEP\* and QUICK CHECK\* Validation Loads Description in the Stryker Sterizone VP4 Sterilizer Cycle 1:

Load #4<sup>A</sup> - Consisted of 15 lumens from rigid and semi-rigid channeled devices. The load included:

Three (3) double channel (six (6) lumens) semi-rigid endoscopes (ureteroscope - 0.7 mm × 500 mm and 1.1 mm × 500 mm) were packaged in three (3) sterilization trays including appropriate silicone brackets.

Additional rigid channel instruments (nine (9) lumens) were added.

Testing was performed with trays wrapped in H400 and H600 sterilization wrap. Validated Sterilization Wrap Grades<sup>B</sup>: H400<sup>C</sup>, H500, H600<sup>C</sup>

Type of Device: Single and double channel flexible endoscopes
HALYARD ONE-STEP\* and QUICK
CHECK\* Validation Loads Description in the Stryker Sterizone VP4 Sterilizer Cycle
1.

Load #8<sup>A</sup> - Consisted of five (5) lumens from single and double channel flexible endoscopes. The load included: Two (2) double channel flexible endoscopes (ureteroscope) with inside diameter of 1 mm and lengths of 850 mm and 989 mm; One (1) single channel flexible endoscope (ureteroscope) with inside diameter of 1 mm and length of 850 mm; The endoscopes were individually packaged in sterilization trays, including appropriate silicone brackets.

Testing was performed with trays wrapped in H400 and H600 sterilization wrap. Validated Sterilization Wrap Grades<sup>B</sup>: H400<sup>C</sup>, H500, H600<sup>C</sup>

Type of Device: Multi-channel flexible endoscopes

HALYARD ONE-STEP\* and QUICK CHECK\* Validation Loads Description in the Stryker Sterizone VP4 Sterilizer Cycle 1:

Load #9<sup>A</sup> - Consisted of one (1) multichannel flexible endoscope with four (4) channels. The load included: One (1) multi flexible endoscope (colonoscope) with no more than four (4) channels having inside diameter of 1.2 mm and lengths of 1955 mm or inside diameter of 1.45 mm

Reusable rigid or semi-rigid nonlumen medical devices including nonlumen devices with metallic diffusionrestricted spaces such or mated surfaces such as the hinged portion of forceps or scissors;

Single channel flexible endoscopes with flexible lumens that are  $\geq 1.00$  mm ID and  $\leq 1280$  mm long; and Dual channel flexible endoscopes with flexible lumens that are  $\geq 0.80$  mm ID and  $\leq 1000$  mm long.

(Refer to the HC 80TT User Manual for complete instructions on load(s) and cycle(s), including chamber loading instructions (i.e. 25 lb per load).

	and lengths of 3500 mm, packaged individually in a sterilization tray.  Testing was performed with trays wrapped in H400 and H600 sterilization wrap.  Validated Sterilization Wrap Grades <sup>B</sup> :  H400 <sup>C</sup> , H500, H600 <sup>C</sup> A: Representative Sterizone® VP4  Sterilizer Cycle 1 Validation Load from		
	K172191. B: HALYARD* ONE-STEP* and QUICK CHECK* Sterilization Wrap are comprised of two sheets of Halyard Sequential Sterilization Wrap ultrasonically bonded together on two		
	sides. Therefore, these grades are applicable to HALYARD* ONE-STEP*, QUICK CHECK* and Sequential Sterilization Wrap. C: Indicates the bracketed grades for validation testing.		7.100
Sterilization	Stryker Sterizone VP4 Sterilizer Cycle	Sterilucent PSD-85 Hydrogen	Different
Parameters	1 which is a dual-sterilant, low temperature sterilizer that uses	Peroxide Sterilizer that includes	
	vaporized hydrogen peroxide (H <sub>2</sub> O <sub>2</sub> )	• Lumen Cycle	
	and ozone (O <sub>3</sub> ) in a single cycle	Flexible Cycle	
Technology	Tortuous sheet material used to enclose medical devices that are to be sterilized by a healthcare provider to allow sterilization of the enclosed medical device(s) and maintain sterility of the enclosed device(s) until used	Tortuous sheet material used to enclose medical devices that are to be sterilized by a healthcare provider to allow sterilization of the enclosed medical device(s) and maintain sterility of the enclosed device(s) until used	Same
Device Design	Two sheets of nonwoven polypropylene fabric. Each sheet is composed of three thermally-bonded layers consisting of a meltblown polypropylene layer surrounded by spunbond polypropylene layers (SMS)	Two sheets of nonwoven polypropylene fabric. Each sheet is composed of three thermally-bonded layers consisting of a meltblown polypropylene layer surrounded by spunbond polypropylene layers (SMS)	Same
Method for	Thermal bonding with round pin,	Thermal bonding with round pin,	Same
Bonding SMS	hexagonal, triangle bond pattern	hexagonal, triangle bond pattern	
Layers	("daisy" pattern)	("daisy" pattern)	
Materials	Polypropylene with blue and white pigments	Polypropylene with blue and white pigments	Same
Distribution	Non-Sterile and Over-the-Counter	Non-Sterile and Over-the-Counter	Same
Single Use Device	Yes	Yes	Same

Summary of Performance Testing Performance Testing

(Bench):

Performance testing of HALYARD ONE-STEP and QUICK CHECK Sterilization Wrap was evaluated and the results showed that acceptance criteria were met demonstrating that the HALYARD ONE-STEP and QUICK CHECK Sterilization Wrap allows sterilization of its contents using the Stryker Sterizone VP4 Sterilizer Cycle 1 and that sterility is maintained for the testing period of 12 months.

**Summary of Non-Clinical Testing Performed** 

Purpose	Test	Acceptance Criteria	Results
Sterilant	ANSI/AAMI ST79	Achieving a 10 <sup>-6</sup> sterility assurance	Passed
Penetration/Efficacy	ANSI/AAMI/ISO 11138-7	level following processing in a worst-	
		case half-cycle	
Performance	ANSI/AAMI/ISO 11607-1 Annex B	Complies with the selected physical	Passed
Testing (Non-sterile	ISO 13938-2	properties	
and Sterile)	ASTM D4966-12		
	CPSC 1610		
Maintenance of	ANSI/AAMI/ISO 11607-1	Maintain sterility for up to 12 months	Passed
Package Integrity	ANSI/AAMI ST79		
Biocompatibility	ISO 10993-1	Non-cytotoxic	Passed
	ISO 10993-5	Non-irritating	
	ISO 10993-10	$H_2O_2 \le 0.56 \ \mu g/cm^2$	
	ISO 10993-7		

Performance Testing

(Clinical): Clinical evaluations were not required and therefore are not submitted with this

510(k).

Discussion: The HALYARD ONE-STEP and QUICK CHECK Sterilization Wrap in this

submission and the predicate device submission are intended to enclose another medical device that is to be sterilized by a healthcare provider, to allow sterilization of the enclosed medical device(s) and to maintain sterility of the enclosed device(s). The ONE-STEP and QUICK CHECK Sterilization Wrap in this submission and the predicate device submission have identical intended use, design, materials, specifications, and composition, and are manufactured using identical production methods. The different technological characteristics, that is, the Indication for Use and the Sterilization Parameters, do not affect the safety and effectiveness of the device as evidenced by the results of the nonclinical

testing.

Overall Performance Conclusions:

The conclusions drawn from the nonclinical tests demonstrate that the

HALYARD ONE-STEP and QUICK CHECK Sterilization Wrap (K214007) is as safe, as effective, and performs as well as or better than the legally marketed

HALYARD ONE-STEP Sterilization Wrap (K192147).