

July 21, 2023

STERIS Corporation Gregory Land Lead Regulatory Affairs Specialist 5960 Heisley Road Mentor, Ohio 44060

Re: K230560

Trade/Device Name: enspire 300 Series Automated Endoscope Reprocessor System Regulation Number: 21 CFR 876.1500 Regulation Name: Endoscope and accessories Regulatory Class: Class II Product Code: NZA Dated: June 13, 2023 Received: June 13, 2023

Dear Gregory Land:

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 https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm 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 Federal Register.

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 https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products); 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 <u>https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems</u>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<u>https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance</u>) and CDRH Learn (<u>https://www.fda.gov/training-and-continuing-education/cdrh-learn</u>). 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 (<u>https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice</u>) for more information or contact DICE by email (<u>DICE@fda.hhs.gov</u>) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Bifeng Qian -S

Bifeng Qian, M.D., Ph.D.
Assistant Director
DHT4B: Division of Infection Control and Plastic Surgery Devices
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Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

Indications for Use

510(k) Number *(if known)* K230560

Device Name

enspire 300 Series Automated Endoscope Reprocessor System

Indications for Use (Describe)

The enspire[™] 300 Series Automated Endoscope Reprocessor System is intended to effectively provide a pressure and channel monitor, clean, high-level disinfect, rinse and air purge validated immersible, reusable, semi-critical, heat sensitive medical devices including, but not limited to, flexible endoscopes and non-channeled naso-endoscopes. The validated cleaning process replaces manual cleaning for endoscopes other than duodenoscopes. Manual Cleaning of endoscopes is required prior to placement in high level disinfection only cycle.

The enspire 300 Series Automated Endoscope Reprocessor System uses Revital-Ox PAA High Level Disinfectant to provide high level disinfection of validated immersible, reusable, semi-critical, heat sensitive medical devices. It automatically mixes the Part A and Part B solutions, high level disinfects the load during a controlled cycle and rinses the load. The wash phase of the enspire 300 Series Automated Endoscope Reprocessor System cycle uses only Revital-Ox 2X Concentrate Enzymatic Detergent to perform cleaning.

The Revital-Ox PA High Level Disinfectant (HLD) is a two-part solution, which when mixed, is intended to provide high level disinfection of validated immersible, reusable, semi-critical, heat sensitive medical devices including, but not limited to, flexible endoscopes and non-channeled naso-endoscopes, when used in the enspire 300 AER.

Over-The-Counter Use (21 CFR 801 Subpart C)				
CONTINUE ON A SEPARATE PAGE IF NEEDED.				
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510(k) Summary enspire 300 Series Automated Endoscope Reprocessor System

STERIS Corporation 5960 Heisley Road Mentor, OH 44060 Phone: (440) 354-2600

Contact: Gregory Land Lead Regulatory Affairs Specialist Tel: 440-392-7424

Summary Date: July 20, 2023

510(k) Number: K230560

1. <u>Device Name</u>

Trade Name:	enspire 300 Series Automated Endoscope Reprocessor System
Device Classification:	Class II
Common/usual Name:	Endoscope Cleaner and Reprocessor
Classification Name:	Accessories, Germicide, Cleaning, For Endoscopes
Classification Number:	21 CFR 876.1500
Product Code:	NZA

2. <u>Predicate Device</u>

Reliance Advance Endoscope Processing System, K123768

3. <u>Description of Device</u>

The enspire 300[™] Series Automated Endoscope Reprocessor System (AER) is a medical device processing system used for cleaning and high level disinfection of immersible, reusable, semi-critical, heat-sensitive devices such as flexible endoscopes and their accessories. The system consists of the enspire 300 AER, Revital-Ox 2X Concentrate Enzymatic Detergent (R2X), and Revital-Ox Peracetic Acid High Level Disinfectant (HLD).

The enspire 300 series AER is an automated, self-contained device for the effective cleaning and high level disinfection of semi-critical medical devices and their accessories. Prior to placement in the processor, users will be instructed to perform bedside (point of use) cleaning and manual leak testing. The devices will not require manual cleaning prior to processing, with the exception of duodenoscopes which will still require manual cleaning per the manufacturer's written instructions. Channel Connectors, as identified in STERIS labeling, are used to facilitate the delivery of the R2X detergent, HLD solution and rinse water to internal channels of devices that have them.

On the first process of an endoscope, the user must create a scope profile for the endoscope in the AER. The creation of the scope profile saves key endoscope attributes to the AER which are used to monitor the cycle during processing of the device. Once the device is positioned in the enspire 300 AER and optional operator ID, case ID, procedure ID and physician information is inputted, the operator initiates the processing cycle during which the Processor will create and maintain the conditions necessary for effective cleaning and high level disinfection. At the beginning of the processing cycle, an automated pressure monitor is performed to assess the integrity of the flexible endoscope. In parallel with the pressure monitor and prior to initiation of the cleaning phase, the processing system will evaluate the flow coefficient of each individual channel and compare to their respective

reference value stored in the device profile created prior to first processing. The enspire 300 AER maintains inflation of the processed device throughout the process to reduce the risk of ingress of fluid in the event of any loss of integrity. At the end of the processing cycle, the cleaned and high level disinfected devices are rinsed with 0.2 micron filtered potable water followed by a dried, oil free, filtered compressed air purge to evacuate rinse water from the endoscope channels. The AER, which is micro-processor controlled and continually monitored, provides documentation of each cycle.

The enspire 300 AER utilizes Revital-Ox 2X Concentrate Enzymatic Detergent for cleaning and Revital-Ox Peracetic Acid High Level Disinfectant for high level disinfection. Revital-Ox PAA HLD is a two part solution consisting of Part A, 15% PAA, and Part B, conditioner.

4. <u>Indications for Use</u>

The enspire 300 Automated Endoscope Reprocessor System is intended to effectively provide a pressure and channel monitor, clean, high-level disinfect, rinse and air purge validated immersible, reusable, semi-critical, heat sensitive medical devices including, but not limited to, flexible endoscopes and non-channeled nasoendoscopes. The validated cleaning process replaces manual cleaning for endoscopes other than duodenoscopes. Manual Cleaning of endoscopes is required prior to placement in high level disinfection only cycle.

The enspire 300 Automated Endoscope Reprocessor System uses Revital-Ox PA High Level Disinfectant to provide high level disinfection of validated immersible, reusable, semi-critical, heat sensitive medical devices. It automatically mixes the Part A and Part B solutions; high level disinfects the load during a controlled cycle and rinses the load. The wash phase of the enspire 300 Series Automated Endoscope Reprocessor System cycle uses only Revital-Ox 2X Concentrate Enzymatic Detergent to perform cleaning.

The Revital-Ox PA High Level Disinfectant (HLD) is a two-part solution, which when mixed, is intended to provide high level disinfection of validated immersible, reusable, semi-critical, heat sensitive medical devices including, but not limited to, flexible endoscopes and non-channeled naso-endoscopes, when used in the enspire 300 AER.

5. <u>Technological Characteristic Comparison Tables</u>

Feature	Proposed enspire 300 Series AER	Predicate K123768 Reliance Advanced EPS	Comparison
Indications for Use	The enspire 300 Automated Endoscope Reprocessor System is intended to effectively provide a pressure	Cleaning and high level disinfection of up to two immersible, reusable, heat-sensitive, semi-	Similar – both systems provide cleaning and high-level

Table 1. Predicate Device Comparison Table

Feature	Proposed enspire 300 Series AER	Predicate K123768 Reliance Advanced EPS	Comparison
	medical devices including, but not limited to, flexible endoscopes and non-channeled naso-endoscopes, when used in the enspire 300 AER.		
Operating Principles / Technology	The enspire 300 AER provide delivery of solutions and fluids to endoscopes and their accessories. Revital-Ox 2X Concentrate Enzymatic detergent and Revital-Ox PAA HLD are introduced into the enspire 300 AER to provide cleaning and high level disinfection. Decontamination cycle is used to help with routine maintenance and to help prevent contamination of the Reprocessor during period of inactivity. Descaling Cycle is used to help prevent and remove scale build-up in the Reprocessor.	The Reliance EPS and its integrated endoscope processing support provide for delivery of solutions and fluids to endoscopes and their accessories. Klenzyme and Reliance DG are introduced into the Reliance EPS to provide cleaning and high level disinfection. Decontamination cycles (D-Long with CIP-200 and D-Short) are used to prevent biofilm formation in the Reliance EPS Processor and ensure effective processing following periods of processor inactivity	Similar – the subject device and the predicate device both use enzymatic cleaner and peracetic acid for cleaning and high level disinfection, respectively. The disinfection differs between the two, the subject device uses thermal disinfection while the predicate uses chemical.
Process Parameters	The cycle parameters cannot be altered by operator. The critical process parameters are: • Contact Time • Use Dilution Temp • Water Volume • Chemical Volume • Channel irrigation flow/pressure	Standardized cycle parameters cannot be altered by operator. The critical process parameters are: • Contact Time • Use Dilution Temp • Cleaning solution and Reliance DG concentration • Water filter integrity	Similar- the subject device uses water and chemical volume rather than solution concentration. The subject device also provides flow monitoring
Process Monitors	Channel irrigation flow alarms when endoscope channel is obstructed or disconnected, if pressure too low or too high, or if sensor defect is detected. Chemical volume alarms if chemical injected volume is	Control Handle Boot pressure alarms if pressure too low to process, or if too high and could potentially damage scopes (specification 6.5 to 10.5 PSI).	Similar – the proposed device has additional process monitoring of all endoscope lumens

Feature	Proposed enspire 300 Series	Predicate K123768	Comparison
	AER	Reliance Advanced EPS	
	too high, too low, chemical pump is defective or chemical container has inadequate volume to complete the cycle. Water volume alarms when water level is too high for HLD. Temperature alarm is triggered when temperature is too high, sump takes too long to heat, RTD variance exceeded or a sensor is defective. Alarm is triggered if Real Time Clock error is detected.	Detection of a fresh Reliance DG container in every processing cycle, Cleaning Solution level monitored; alarm indicates when container does not have sufficient amount to complete cycle Temperature alarms if outside of range Water filter integrity test at end of each high level disinfection cycle.	individually.
Design Features	 Intended for use with Revital- Ox 2X Concentrate Enzymatic Detergent and Revital-Ox PAA HLD Microprocessor controlled Internal components constructed of stainless steel, silicone, polypropylene and PVDF. Processor provides 0.2 micron filtered water for rinsing Automated injection of cleaning and HLD solutions, with accuracy monitored by a flow meter Uses dried, oil free and filtered compressed air for Air Purge Automated endoscope pressure monitor Monitors channel flow Includes a bar code scanner; employs touchscreen display interface Separate, optional printer 	 Intended for use with Reliance DG only Microprocessor controlled Internal components constructed of stainless steel, silicone, polypropylene and PVDF. Processor provides 0.2 micron filtered water for washing, disinfection and rinsing Automated injection of solutions with accuracy monitored by a flow meter. Automated generation and delivery of high level disinfectant solution Air intake for Air Purge is HEPA filtered Automated endoscope leak test Barcode scanner Separate, optional printer 	Similar – the subject device has additional monitoring of channel flow and use of a touch screen.
Cycle Paramete	rs		Comparison
Pressure Monitor	Performed at the beginning of the cycle	Performed at the beginning of the cycle	Same
Flow check	Performed at the beginning and end of the cycle	Not present	Different – The subject device has a Flow

Feature	Proposed enspire 300 Series AER	Predicate K123768 Reliance Advanced EPS	Comparison
			Check in the cycle which
			monitors the
			flow to each
			lumen of an
			endoscope
Cleaning	50-55°C	50-57°C	Similar –
Phase			subject device
Temperature			operates in a
			narrower range
			of the predicate
Cleaning	4.5 minutes wash	5 minutes	Similar –
Phase			subject device is
Exposure time	20 1	10 1	quicker
Rinse phase	30 seconds	40 seconds	Similar –
after cleaning			subject device is
	50,5500	50.5700	quicker
HLD phase	50-55°C	50-57°C	Similar –
Temperature			subject device
			operates in a
			narrower range of the predicate
			range
HLD phase	3 minutes	6 minutes	Similar –
exposure time	5 minutes	o minuces	subject device is
			quicker
Rinse Phase	30 seconds	40 seconds	Similar –
after HLD			subject device is
phase			quicker
Number of rinses	2	2	Same
Air purge	Performed between each phase	Performed at the end of	Same
1 0	and at the end of the cycle	the cycle	
Accessories			Comparison
Detergent	Revital-Ox 2X Concentrate	Klenzyme	Similar – both
_	Enzymatic Detergent		are enzymatic
			cleaners
HLD	Revital-Ox PAA HLD	Reliance DG	Similar – both
			are peracetic
			acid based HLD
Chemical	enspire 300 series AER	VERIFY Process	Similar – both
Indicator	Process monitor. Peracetic	Indicator for Reliance	use a chemical
	acid dose indicator for routine	EPS. Peracetic acid dose	indicator but the
	monitoring of enspire 300	indicator for routine	indicator is
	AER using Revital-Ox PAA	monitoring of Reliance	different.

Feature	Proposed enspire 300 Series	Predicate K123768	Comparison
	AER	Reliance Advanced EPS	
	HLD. Chemical reaction on	EPS using Reliance DG.	
	indicator pad to produce color	Chemical reaction on	
	change.	indicator pad to produce	
		color change.	
Scope	Scope connectors are required	Flow Units are required	Similar – both
Connectors /	for all lumens of endoscopes.	only for scope channels	use connectors
Flow Units		that do not open in the	to flush lumens
		endoscope control handle	of endoscopes
		or mechanical action is	
		required for valve	
		operation.	
Operator	Periodic replacement of water	Periodic replacement of	Similar – both
Maintenance	filters. Periodic replacement	water and air filters. D-	require the
	of printer tape if using the	SHORT decontamination	periodic
	external printer option.	cycle required every 54-	replacement of
	Running the decontamination	hours	filters and
	cycle every 24 hours.	D-LONG	running of
		decontamination cycle	decontamination
		required if D-SHORT not	cycles.
		performed within past 54	
		hours.	

Table 2. HLD Device Comparison Table

Feature	Proposed Revital-Ox PAA	Predicate Reliance DG	Comparison
	HLD	Dry Germicide	
Intended Use	The Revital-Ox PA High	The Reliance Endoscope	Same
	Level Disinfectant (HLD) is a	Processing System is	
	two-part solution, which	intended for washing and	
	when mixed, is intended to	high level disinfection of	
	provide high level	up to two manually pre-	
	disinfection of validated	cleaned, immersible,	
	immersible, reusable, semi-	reusable, heat-sensitive,	
	critical, heat sensitive	semi-critical devices such	
	medical devices including,	as GI flexible endoscopes,	
	but not limited to, flexible	bronchoscopes and their	
	endoscopes and non-	accessories. High level	
	channeled naso-endoscopes,	disinfection is achieved	
	when used in the enspire 300	within the 50-57°C HLD	
	AER.	phase of the endoscope	
		processing cycle (4-	
		minute generation	
		sequence followed by a 6-	
		minute exposure	
		sequence).	
Germicidal	High level disinfectant	High level disinfectant	Same

Feature	Proposed Revital-Ox PAA HLD	Predicate Reliance DG Dry Germicide	Comparison
claim			
Germicide Exposure time for HLD (min)	3 minutes	10 minutes (4-minute generation sequence followed by a 6-minute exposure sequence)	Similar – The exposure time for high level disinfection is quicker on the subject device
Use Temperature	50-55°C	50-57°C	Similar – the operating range is narrower and included in the predicate device
Reuse	Single Use dilution	Single Use dilution	Same
Active Ingredient	Peracetic acid	Peracetic acid	Same
Mode of Action	It is believed that peracetic acid exerts its germicidal effect by several mechanisms: -oxidizing sulfhydral and sulfur bonds in proteins and enzymes, particularly in the cell walls ¹ -hydroxyl radicals produced from PAA are bactericidal ² -PAA damages the viral capsid and viral nucleic acid ^{3,4}	It is believed that peracetic acid exerts its germicidal effect by several mechanisms: -oxidizing sulfhydral and sulfur bonds in proteins and enzymes, particularly in the cell walls ¹ -hydroxyl radicals produced from PAA are bactericidal ² -PAA damages the viral capsid and viral nucleic acid ^{3,4}	Same
Rinse	2 rinses, 30 seconds each with 0.2µ filtered water	2 rinses, 40 seconds each, with 0.2µ filtered water	Similar – the rinse time of the subject device is quicker
Microbial Effica	acy		
Sporicidal Activity of Disinfectants AOAC Official Method 966.04	Meets efficacy requirements. Bacillus subtilis Clostridium sporogenes	Meets efficacy requirements. <i>Bacillus subtilis</i> <i>Clostridium sporogenes</i>	Same
Confirmatory Sporicidal Activity of Disinfectants	Meets efficacy requirements.s Bacillus subtilis Clostridium sporogene	Meets efficacy requirements.5 <i>Bacillus subtilis</i> <i>Clostridium sporogenes</i>	Same

Feature	Proposed Revital-Ox PAA HLD	Predicate Reliance DG Dry Germicide	Comparison
AOAC Official Method 966.04			
Fungicidal Activity of Disinfectants AOAC Official Method 955.17	Solution is fungicidal. <i>Trichophyton interdigitale</i>	Solution is fungicidal. <i>Trichophyton</i> <i>mentagrophytes</i>	Same
Use-Dilution Method AOAC, Official Methods 955.14, 955.15, 964.02	Solution is bactericidal Salmonella enterica Staphylococcus aureus Pseudomonas aeruginosa	Solution is bactericidal. Salmonella choleraesuis Staphylococcus aureus Pseudomonas aeruginosa	Same
EPA Virucidal Testing (DIS/TSS-7, Nov. 1981)	Process conditions are virucidal. Herpes simplex Type 1 Adenovirus Type 5 Poliovirus Type 1	Process conditions are virucidal. Herpes simplex Type 1 Adenovirus Type 5 Poliovirus Type 1	Same
Tuberculocidal Activity Ascenzi Quantitative Suspension Test	Solution is tuberculocidal Mycobacterium terrae	Solution is tuberculocidal <i>Mycobacterium terrae</i>	Same
Simulated Use Test	Meets efficacy requirement. $\geq 6 \log reduction$ <i>Mycobacterium terrae</i> in a manual application	Meets efficacy requirement. $\geq 6 \log$ reduction <i>Mycobacterium</i> <i>terrae</i> in a manual application	Same
Clinical In-use test	Non surviving microorganisms on representative medical devices tested	Non surviving microorganisms on representative medical devices tested	Same
Bio compatibilit	ſ		
Cytotoxicity device extracts	Non-Cytotoxic per ISO 10993-5	Non-cytotoxic per ISO 10993-5	Same
Residue Reduction	Automatic within the enspire 300 AER. 2 rinses with 0.2µ filtered water after HLD cycle effectively reduces	Automatic within the Reliance Endoscope Processor, 2 rinses with 0.2µ filtered water after	Same

Feature	Proposed Revital-Ox PAA HLD germicide residues to safe levels.	Predicate Reliance DG Dry Germicide HLD cycle effectively reduces residues germicide residues to safe	Comparison
Device Material Compatibility	Compatible with medical devices as established by testing finished flexible endoscopes through 300 cycles and rigid devices through 150 cycles. No functional changes have occurred to flexible or rigid devices. Some materials show cosmetic changes such as fading of black anodized aluminum without harm to the base material.	levels. Compatible with intended flexible endoscopes and accessories established through testing finished medical devices. No device functional changes. Some materials show cosmetic changes such as fading of external markings but all remained legible and fading of black anodized aluminum without harm to the base material.	Same

6. <u>Summary of Non-Clinical Testing</u>

Shown in **Table 3** is the new testing that was performed to evaluate the enspire 300 Automated Endoscope Reprocessor System.

Table 3. Summary of verification activities.

Test	Acceptance Criteria	Result
Simulated Use	Cleaning: Worst-case devices were soiled and processed in triplicate trials using the cleaning phase of the processing cycle, then examined visually and sampled for quantitation of two soil markers: protein < 6.4 µg/cm^2 and TOC < 12 µg/cm^2 .	PASS
Testing	High Level Disinfection: Worst case devices were inoculated with <i>Mycobacterium. terrae</i> in triplicate trials and processed using the HLD phase of the processing cycle, then sampled to demonstrate $\geq 6 \log_{10}$ reduction per channel of <i>M. terrae</i> .	PASS
In Use Testing	Cleaning: Clinically used devices were placed into the enspire 300 AER and exposed to a full processing cycle. At the end of the cycle, the devices were examined visually and sampled for quantitation of two soil markers: protein < $6.4 \mu\text{g/cm}^2$ and TOC < $12 \mu\text{g/cm}^2$.	PASS
	High Level Disinfection: Clinically used devices were placed into the enspire 300 AER and exposed to a full processing cycle. At the end of the cycle, the devices were sampled to demonstrate no growth of organisms.	PASS
Rinsing Efficacy (Cytotoxicity	A representative endoscope was exposed to multiple processing cycles and extracted per ISO 10993-12:2021. The device extracts	PASS

Test	Acceptance Criteria	Result
test)	were analyzed to verify chemical residual levels were below the	
	highest acceptable levels.	
Biocompatibility	A representative endoscope was exposed to multiple processing cycles and extracted per ISO 10993-12: 2021. The device extracts were tested for	PASS
	• Hemolysis per ISO 10993-4:2017	
	• Cytotoxicity per ISO 10993-5:2009/(R) 2014	
	 Sensitization per ISO 10993-10:2021 	
	• Acute Systemic toxicity per ISO 10993-11:2017	
	Irritation per ISO 10993-23:2021	
Toxicological Assessment	The Toxicity assessment of the cleaning and HLD Chemistries for short-term endpoints and the long term/repeated exposure should show no significant risk concerns.	PASS
Material Compatibility	Representative devices were exposed to multiple processing cycles and evaluated for physical changes to demonstrate material compatibility with the process and chemistries used.	PASS
Human Factors	Typical users were capable of following written instructions for use to correctly load devices into the enspire 300 AER, attach Scope Connectors, and successfully run the processing cycle.	PASS
Electrical Safety Conformance	 Meets requirements per: UL 61010-1, Safety Requirements for Electrical Equipment for Measurement, Control, and Laboratory Use – Part 1: General Requirements, 3rd Edition IEC 61010-2-040:2020, Safety Requirements for Electrical Equipment for measurement, control and laboratory use – Part 2-040: Particular Requirements for Sterilizers and Washer-Disinfectors Used to Treat Medical Materials IEC 60601-1-2:2015, +A1:2021 Medical Electrical Equipment, Part 1-2: General Requirements for Safety - Collateral Standard: Electromagnetic Compatibility - Requirements and Tests. 	PASS
Software Validation	 Meets requirements per: IEC 62304:2006/A1:2016, Medical device software – Software life cycle processes [Including Amendment 1(2016)] 	PASS

Clinical Testing: Not required for the subject device

7. <u>Conclusion</u>

Based on the intended use, technological characteristics and non-clinical performance data, the subject device is as safe, as effective and performs as well as or better than the legally marketed predicate device (K123768), Class II (21 CFR 876.1500), product code NZA.