



March 9, 2021

JJGC Industria e Comercio de Materiais Dentarios S.A.
% Jennifer Jackson
Director of Regulatory Affairs
Straumann USA, LLC
60 Minuteman Road
Andover, Massachusetts 01810

Re: K203618
Trade/Device Name: Neodent EasyGuide Kit Cases
Regulation Number: 21 CFR 880.6850
Regulation Name: Sterilization Wrap
Regulatory Class: Class II
Product Code: KCT
Dated: December 11, 2020
Received: December 11, 2020

Dear Jennifer Jackson:

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 <https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems>.

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

Sincerely,

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

Indications for Use

510(k) Number (if known)
K203618

Device Name
Neodent EasyGuide Kit Cases

Indications for Use (Describe)

Indications for Use for GM EasyGuide Surgical Kit Case Narrow/Regular Diam Implants:

Neodent Instruments Kits are intended to be used to enclose other medical devices that are to be sterilized by a health care provider. Neodent Instruments Kits are intended to allow sterilization of the enclosed medical devices. Neodent Instruments Kits require the use of FDA-cleared wrap to maintain the sterility of enclosed devices.

The kits are to be enclose in a sterilization wrap that is FDA-cleared for the indicated cycles, and moist heat (steam) sterilized using one of the following cycles:

Fractionated vacuum (pre-vacuum) - Exposure at 132 °C for 4 minutes, 20 minutes dry time.

Gravity displacement - Exposure at 132 °C for 15 minutes, 20-minutes dry-time.

Neodent Instruments Kits are intended for sterilization of non-porous loads.

The combined weight of GM EasyGuide Surgical Kit Case Narrow/Regular Diam Implants and the associated instruments is 310,18 g. The weight of the empty Kit Case is 263,63 g

Neodent GM EasyGuide Kit Cases should not be stacked during sterilization

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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Indications for Use

510(k) Number (if known)
K203618

Device Name
Neodent EasyGuide Kit Cases

Indications for Use (Describe)

Indications for Use for GM EasyGuide Surgical Kit Case Regular/Large Diam Implants:

Neodent Instruments Kits are intended to be used to enclose other medical devices that are to be sterilized by a health care provider. Neodent Instruments Kits are intended to allow sterilization of the enclosed medical devices. Neodent Instruments Kits require the use of FDA-cleared wrap to maintain the sterility of enclosed devices.

The kits are to be enclosed in a sterilization wrap that is FDA-cleared for the indicated cycles, and moist heat (steam) sterilized using one of the following cycles:

Fractionated vacuum (pre-vacuum) - Exposure at 132 °C for 4 minutes, 20 minutes dry-time.

Gravity displacement - Exposure at 132 °C for 15 minutes, 45-minutes dry-time.

Neodent Instruments Kits are intended for sterilization of non-porous loads.

The combined weight of the GM EasyGuide Surgical Kit Case Regular/Large Diam Implants and the associated instruments is 346,45 g. The weight of the empty Kit Case is 264,12 g.

Neodent GM EasyGuide Kit Cases should not be stacked during sterilization.

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)

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510(K) Summary – K203618

ADMINISTRATIVE INFORMATION

Sponsor JJGC Indústria e Comércio de Materiais Dentários SA
(dba Neodent)
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Curitiba, Parana, Brazil 81270-200
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Date Prepared 09/March/2021

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DEVICE NAME AND CLASSIFICATION

Trade/ Proprietary Name Neodent EasyGuide Kit Cases
Common Name Instrument Sterilization Trays
Classification Name Sterilization Wrap Containers, Trays, Cassettes & Other
Classification Regulations 21 CFR 880.6850, Class II
Product Code KCT
Classification Panel General Hospital
Reviewing Branch Infection Control Devices Branch

PREDICATE DEVICE INFORMATION

Primary Predicate Device K192670 – Neodent Instrument Kit Cases, JJGC Indústria e Comércio de
Materiais Dentários S.A

INDICATIONS FOR USE

Indications for Use for GM EasyGuide Surgical Kit Case Narrow/Regular Diameter Implants:

Neodent Instrument Kits are intended to be used to enclose other medical devices that are to be sterilized by a health care provider. Neodent Instrument Kits are intended to allow sterilization of the enclosed medical devices. Neodent Instrument Kits require the use of FDA-cleared wrap to maintain the sterility of the enclosed devices.

The Kits are to be enclosed in a sterilization wrap that is FDA-cleared for the indicated cycles, and moist heat (steam) sterilized using one of the following cycles:

Fractionated vacuum (pre-vacuum) – Exposure at 132 °C for 4 minutes, 20-minute dry time.

Gravity displacement – Exposure at 132 °C for 15 minutes, 20-minute dry time.

Neodent Instrument Kits are intended for sterilization of non-porous loads.

The combined weight of the GM EasyGuide Surgical Kit Case Narrow/Regular and the associated instruments is 310,18 g. The weight of the empty Kit Case is 263,63 g.

Neodent GM EasyGuide Kit Cases should not be stacked during sterilization

Indications for Use for GM EasyGuide Surgical Kit Case Regular/Large Diameter Implants:

Neodent Instrument Kits are intended to be used to enclose other medical devices that are to be sterilized by a health care provider. Neodent Instrument Kits are intended to allow sterilization of the enclosed medical devices. Neodent Instrument Kits require the use of FDA-cleared wrap to maintain the sterility of the enclosed devices.

The Kits are to be enclosed in a sterilization wrap that is FDA-cleared for the indicated cycles, and moist heat (steam) sterilized using one of the following cycles:

Fractionated vacuum (pre-vacuum) – Exposure at 132 °C for 4 minutes, 20-minute dry time.

Gravity displacement – Exposure at 132 °C for 15 minutes, 45-minute dry time.

Neodent Instrument Kits are intended for sterilization of non-porous loads.

The combined weight of the GM EasyGuide Surgical Kit Case Regular/Large and the associated instruments is 346,45 g. The weight of the empty Kit Case is 264,12 g.

Neodent GM EasyGuide Kit Cases should not be stacked during sterilization.

SUBJECT DEVICE DESCRIPTION

The subject device kit cases are reusable rigid containers, comprising a case bottom (or base), a removable inner tray, and tray lid (lid). The subject device kits are to be used to organize and protect instruments and accessories that are to be sterilized by the healthcare provider. The subject kit cases are manufactured in autoclavable polymer. The design of the subject devices includes grommets manufactured from medical grade silicone that retain the instruments within the tray. The subject device kit cases are provided nonsterile to the end-user.

510(K) Summary – K203618

The dimensions for each part of the model and the overall dimensions are presented in the table below:

Assembled Kit Case	Description	Assembled Kit Case Dimension (L x W x H)	Component Number	Component Dimension (L x W x H)
110.313	GM EasyGuide Surgical Kit Case Narrow/Regular Diam Implants	195 x 90 x 64 mm	212.293 (Lid)	195 x 90 x 36 mm
			703861 (Tray)	180 x 76 x 27 mm
			703863 (Base)	188 x 84 x 42 mm
110.314	GM EasyGuide Surgical Kit Case Regular/Large Diam Implants	195 x 90 x 64 mm	212.293 (Lid)	195 x 90 x 36 mm
			703862 (Tray)	180 x 76 x 27 mm
			703863 (Base)	188 x 84 x 42 mm

Note: The instrument and accessory devices that are sterilized and stored within the subject Kit Cases are not themselves subject devices of this submission.

510(K) Summary – K203618

TECHNOLOGICAL CHARACTERISTIC COMPARISON TABLE

	SUBJECT DEVICE	PRIMARY PREDICATE DEVICE	COMPARISON
	K203618 Neodent EasyGuide Kit Cases JJGC Indústria e Comércio de Materiais Dentários S.A.	K192670 Neodent Instrument Kit Cases JJGC Indústria e Comércio de Materiais Dentários S.A.	
Indications for Use Statement	<p>Indications for Use for GM EasyGuide Surgical Kit Case Narrow/Regular Diam Implants:</p> <p>Neodent Instrument Kits are intended to be used to enclose other medical devices that are to be sterilized by a health care provider. Neodent Instrument Kits are intended to allow sterilization of the enclosed medical devices. Neodent Instrument Kits require the use of FDA-cleared wrap to maintain the sterility of the enclosed devices.</p> <p>The Kits are to be enclosed in a sterilization wrap that is FDA-cleared for the indicated cycles, and moist heat (steam) sterilized using one of the following cycles:</p> <p>Fractionated vacuum (pre-vacuum) – Exposure at 132 °C for 4 minutes, 20-minute dry time.</p> <p>Gravity displacement – Exposure at 132 °C for 15 minutes, 20-minute dry time.</p> <p>Neodent Instrument Kits are intended for sterilization of non-porous loads.</p> <p>The combined weight of the GM EasyGuide Surgical Kit Case Narrow/Regular Diam Implants and the associated instruments is 310,18 g. The weight of the empty Kit Case is 263,63 g.</p> <p>Neodent GM EasyGuide Kit Cases should not be stacked during sterilization</p> <p>Indications for Use for GM EasyGuide Surgical Kit Case Regular/Large Diam Implants:</p> <p>Neodent Instrument Kits are intended to be used to enclose other medical devices that are to be sterilized by a health care provider. Neodent Instrument Kits are intended to allow sterilization of the enclosed medical devices. Neodent Instrument Kits require the use of FDA-cleared wrap to maintain the sterility of the enclosed devices.</p> <p>The Kits are to be enclosed in a sterilization wrap that is FDA-cleared for the indicated cycles, and moist heat (steam) sterilized using one of the following cycles:</p> <p>Fractionated vacuum (pre-vacuum) – Exposure at 132 °C for 4 minutes, 20-minute dry time.</p> <p>Gravity displacement – Exposure at 132 °C for 15 minutes, 45-minute dry time.</p> <p>Neodent Instrument Kits are intended for sterilization of non-porous loads.</p> <p>The combined weight of the GM EasyGuide Surgical Kit Case Regular/Large Diam Implants and the associated instruments is 346,45 g. The weight of the empty Kit Case is 264,12 g.</p> <p>Neodent EasyGuide Kit Cases should not be stacked during sterilization.</p>	<p>Indications for Use for GM Surgical Kit Case:</p> <p>Neodent Instrument Kit Cases are intended to be used to enclose other medical devices that are to be sterilized by a health care provider. Neodent Instrument Kit Cases are intended to allow sterilization of the enclosed medical devices. Neodent Instrument Kit Cases require the use of FDA cleared wrap to maintain the sterility of the enclosed devices.</p> <p>The kits are to be enclosed in a sterilization wrap that is FDA-cleared for the indicated cycles, and moist heat (steam) sterilized using one of the following cycles:</p> <p>Fractionated vacuum (pre-vacuum) – Exposure at 132 °C for 4 minutes, 20-minute dry time.</p> <p>Gravity displacement – Exposure at 132 °C for 15 minutes, 40-minute dry time.</p> <p>Neodent Instrument Kit Cases are intended for sterilization of non-porous loads.</p> <p>The combined weight of the GM Surgical Kit Case and the associated instruments is 613.1 g. The weight of the empty Kit Case is 510 grams. Neodent Instrument Kit Cases should not to be stacked during sterilization.</p> <p>Indications for Use for GM Helix Compact Surgical Kit Case:</p> <p>Neodent Instrument Kit Cases are intended to be used to enclose other medical devices that are to be sterilized by a health care provider. Neodent Instrument Kit Cases are intended to allow sterilization of the enclosed medical devices. Neodent Instrument Kit Cases require the use of FDA cleared wrap to maintain the sterility of the enclosed devices.</p> <p>The kits are to be enclosed in a sterilization wrap that is FDA-cleared for the indicated cycles, and moist heat (steam) sterilized using one of the following cycles:</p> <p>Fractionated vacuum (pre-vacuum) – Exposure at 132 °C for 4 minutes, 20-minute dry time</p> <p>Gravity displacement – Exposure at 132 °C for 15 minutes, 20-minute dry time.</p> <p>Neodent Instrument Kit Cases are intended for sterilization of non-porous loads.</p> <p>The combined weight of the GM Helix Compact Surgical Kit Case and the associated instruments is 308.2 g. The weight of the empty Kit Case is 231 grams. Neodent Instrument Kit Cases should not to be stacked during sterilization.</p>	<p>Similar</p> <p>The indications for use are equivalent. The difference in the text is specific due to the weight of each device in their maximum load configuration.</p>

510(K) Summary – K203618

	SUBJECT DEVICE	PRIMARY PREDICATE DEVICE	COMPARISON
	K203618 Neodent EasyGuide Kit Cases JJGC Indústria e Comércio de Materiais Dentários S.A.	K192670 Neodent Instrument Kit Cases JJGC Indústria e Comércio de Materiais Dentários S.A.	
Intended Use	The GM EasyGuide Kit Cases are used for the safe storage of surgical instruments, as well as for support during sterilization.	The GM Helix Compact Surgical Kit Case is suitable for safe storage of surgical and prosthetic instruments, organizing the instruments in the sequence in which they will be used, as well as for sterilization of such instruments.	Same Both subject and predicate devices are intended to safe storage surgical instruments and provide support during sterilization.
Design	Rigid polysulfone polymer base and removable inner tray with a polyphenylsulfone lid. Retention grommets of medical grade silicone.	Rigid polysulfone polymer base and removable inner tray with a polyphenylsulfone lid. Retention grommets of medical grade silicone.	Identical Both subject and predicate devices have the same materials.
Perforated	Yes; allows moist heat (steam) penetration to achieve sterilization	Yes; allows moist heat (steam) penetration to achieve sterilization	Identical
Reusable	Yes	Yes	Identical
Overall dimensions	110.313: 195 L x 90 W x 64 H, mm 110.314: 195 L x 90 W x 64 H, mm	110.288: 264 L x 163 W x 54 H, mm 110.297: 195 L x 90 W x 64 H, mm	Similar Subject Kit Cases have the same size of the article 110.297 of the predicate device. Both devices cleared per K192670 are equal or bigger than the subject devices, this characteristic suggests that the predicate devices can be considered worst case representative to the subject devices. This statement is better discussed along this submission.
Volume to Vent Ratio	110.313: 63.5 cm ³ / cm ² (25.0 in ³ /in ²) 110.314: 63.5 cm ³ / cm ² (25.0 in ³ /in ²)	110.288: 98.04 cm ³ / cm ² (38.6 in ³ /in ²) 110.297: 63.5 cm ³ / cm ² (25.0 in ³ /in ²)	Similar The predicate devices have volume to vent ratio equal or bigger than the subject devices.
Useful Life	Yes, reusable up to 100 cycles	Yes, reusable up to 100 cycles	Identical

510(K) Summary – K203618

	SUBJECT DEVICE	PRIMARY PREDICATE DEVICE	COMPARISON
	K203618 Neodent EasyGuide Kit Cases JJGC Indústria e Comércio de Materiais Dentários S.A.	K192670 Neodent Instrument Kit Cases JJGC Indústria e Comércio de Materiais Dentários S.A.	
Biocompatibility	The assessment to Biocompatibility was performed per ISO 10993-1 and testing was performed using methods described in AAMI/ANSI/ISO 10993-5. The results indicate that the subject devices are biocompatible.	The assessment to Biocompatibility was performed per ISO 10993-1 and testing was performed using methods described in AAMI/ANSI/ISO 10993-5. The results indicate that the subject devices are biocompatible.	Similar
Sterilization Method	Moist heat (steam) to a SAL of 10 ⁻⁶	Moist heat (steam) to a SAL of 10 ⁻⁶	Identical
Cycles	Gravity displacement Fractionated vacuum (pre-vacuum)	Gravity displacement Fractionated vacuum (pre-vacuum)	Same
Parameters	<u>Gravity</u> Sterilization temperature: 132 °C Sterilization time: 15 minutes; Drying time: 20 minutes (model number 110.313) or 45 minutes (model number 110.314) <u>Pre-Vacuum</u> Sterilization temperature: 132 °C Sterilization time: 4 minutes; Drying time: 20 minutes.	<u>Gravity</u> Sterilization temperature: 132 °C Sterilization time: 15 minutes; Drying time: 40 minutes (model number 110.288) or 20 minutes (model number 110.297) <u>Pre-Vacuum</u> Sterilization temperature: 132 °C Sterilization time: 4 minutes; Drying time: 20 minutes.	Same The subject devices have the same cycle parameters, however the subject devices require a longer drying cycle when sterilized via Gravity Displacement.
Sterile Barrier	Sterilization wrap, FDA-cleared for indicated method and cycles	Sterilization pouch, FDA-cleared for indicated method and cycles	Identical

The subject devices and the primary predicate device per K192670 have the same intended use and have equivalent Indications for Use Statements. The subject devices and the primary predicate devices are reusable rigid containers used to organize and protect dental surgical instruments that are sterilized by the healthcare provider. The subject device and the primary predicate device components are perforated to allow for penetration of the moist heat (steam) sterilant and require the use of an FDA-cleared wrap or pouch to maintain sterility.

The subject devices and the primary predicate devices include components manufactured from polyphenylsulfone and polysulfone. The subject devices have the same size, whereas the primary predicate device is provided in two different size and configurations. The overall dimensions of the subject device are similar to the range of overall dimensions cleared for the predicate devices. The subject device and the predicate devices are manufactured from materials with a history biocompatibility and clinical use for the cleared indications. The subject device and the predicate devices are to be used according to the validated labeling (sterilization processes and cycles).

510(K) Summary – K203618

NON-CLINICAL PERFORMANCE DATA

Standard or Test Method	Purpose of the Testing	Acceptance Criteria	Results												
<p>AAMI TIR30:2011</p> <ul style="list-style-type: none"> The validation follows the standard, but the cleaning procedures are according to what is recommended by the manufacturer. 	<p>Manual cleaning validation</p> <ul style="list-style-type: none"> Test Soil: Blood Soil (BLSO) Cleaning Method: Manual Residuals Tested: Hemoglobin and Protein 	<ul style="list-style-type: none"> Visual Inspection: No Visible Soil Hemoglobin Test: <2.2 µg/cm² Protein Test: <6.4 µg/cm² 	<ul style="list-style-type: none"> No visible soil < 0.012 µg/cm² < 0.028 µg/cm² <p>All the acceptance criteria were met</p>												
<p>ANSI/AAMI/ISO 17665-1</p> <p>ANSI/AAMI/ISO 17665-2</p>	<p>Sterilization validation, including sterilant penetration and drying time</p>	<p>All Biological Indicators must be incubated for at least 7 days at 55-60°C. All positive controls for SAL testing must show characteristic growth of the indicator organism.</p>	<ul style="list-style-type: none"> SAL 10⁻⁶ approved Dry time of 20 minutes: approved <p>Validated Parameters Approved:</p> <table border="1"> <thead> <tr> <th>Sterilizer Type</th> <th>Temperature</th> <th>Full Cycle Time</th> <th>Dry Time</th> </tr> </thead> <tbody> <tr> <td>Prevacuum</td> <td>132 °C</td> <td>4 minutes</td> <td>20 minutes</td> </tr> <tr> <td>Gravity</td> <td>132 °C</td> <td>15 minutes</td> <td>20 minutes</td> </tr> </tbody> </table>	Sterilizer Type	Temperature	Full Cycle Time	Dry Time	Prevacuum	132 °C	4 minutes	20 minutes	Gravity	132 °C	15 minutes	20 minutes
Sterilizer Type	Temperature	Full Cycle Time	Dry Time												
Prevacuum	132 °C	4 minutes	20 minutes												
Gravity	132 °C	15 minutes	20 minutes												
<p>Reprocessing Medical Devices in Health Care Settings: Validation Methods and Labeling Guidance for Industry and Food and Drug Administration Staff</p>	<p>Life cycle (simulate usage) testing</p>	<p>The tested samples must withstand 100 cycles of use (cleaning, sterilization and functional tests) without compromising their functionalities</p>	<p>All evaluated cassettes were approved after 100 cycles of use, respecting the established acceptance criteria. Through the functional and visual analysis, an obligatory requirement for continuation of the cycles of use, it can be concluded that the assembly of all the components of the cassette (cover, bottom, tray base), occurred perfectly, in addition, that was no difficulty in insertion of the instruments used in the cassettes or failure of the locking mechanism (of the cassette that have this mechanism), not being observed any type of damage or breakdown that could compromise the functionality of the cassettes.</p>												

510(K) Summary – K203618

ANSI/AAMI/ISO 10993-5 (Cytotoxicity)	Cytotoxicity testing	Less than 30% cell proliferation inhibition	In the presence of the test extract proliferation of L929 cell culture was not affected compared to untreated reagent control cultures which indicates that substances were not released in cytotoxic concentrations under the test conditions described. The results of the reagent control and the experimental controls confirm the sensitivity and accuracy of the test system.
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CONCLUSION

The conclusions drawn from the nonclinical data demonstrate that the Neodent EasyGuide Kit Cases are as safe, as effective, and performs as well as or better than the legally marketed device.