

Food and Drug Administration 10903 New Hampshire Avenue Document Control Center – WO66-G609 Silver Spring, MD 20993-0002

August 13, 2015

Conventus Orthopaedics, Incorporated Mr. Kent R. Lind Vice President Quality, Regulatory, Clinical 10200 73<sup>rd</sup> Avenue North, Suite 122 Maple Grove, Minnesota 55369

Re: K151379

Trade/Device Name: Conventus PRS<sup>TM</sup> System

Regulation Number: 21 CFR 888.3030

Regulation Name: Single/Multiple Component Metallic Bone Fixation Appliances And

Accessories

Regulatory Class: Class II Product Code: HRS, HSB Dated: May 21, 2015 Received: May 22, 2015

Dear Mr. Lind:

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. 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); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address

http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to

<u>http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm</u> for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address

http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

Sincerely yours,

Mark N. Melkerson -S

Mark N. Melkerson Director Division of Orthopedic Devices Office of Device Evaluation Center for Devices and Radiological Health

Enclosure

K151379 Pg.1/1

### DEPARTMENT OF HEALTH AND HUMAN SERVICES Food and Drug Administration

Form Approved: OMB No. 0910-0120 Expiration Date: January 31, 2017

Indications for Use	See PRA Statement below.
510(k) Number (if known)	
Device Name Conventus PRS <sup>TM</sup> System	
Indications for Use (Describe)	
The Conventus PRSTM System is indicated for treatment of proximal ra	
fracture fragments are not too numerous and/or too small to be stabilize	zed with the use of the device.
Type of Use (Select one or both, as applicable)	
	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.

# \*DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.\*

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> Department of Health and Human Services Food and Drug Administration Office of Chief Information Officer Paperwork Reduction Act (PRA) Staff PRAStaff@fda.hhs.gov

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# 510(k) Summary

**Company:** Conventus Orthopaedics, Inc.

10200 73<sup>rd</sup> Avenue North, Suite 122

Maple Grove, MN 55369

**Device Trade Name:** Conventus PRS<sup>TM</sup> System

**Device Common Name:** Proximal radius fracture system

**Contact:** Kent R. Lind

Vice President, Quality, Regulatory, Clinical

Phone: (763) 515-5003 Fax: (763) 315-4980

**Date Prepared:** July 27, 2015

Classification: 21 CFR 888.3030, Single/multiple component metallic bone

fixation appliances and accessories

21 CFR 888.3020: Intramedullary fixation rod

Class:

**Product Codes:** HRS and HSB

**Indications for Use:** The Conventus PRS<sup>TM</sup> System is indicated for treatment of

proximal radial fractures when internal fixation is desired, and fracture fragments are not too numerous and/or too small to be

stabilized with the use of the device.

**Device Description:** The Conventus PRS<sup>TM</sup> is an intramedullary device intended for

proximal radius fractures. The PRS<sup>TM</sup> System is a self-expanding implant which is deployed into the medullary canal and provides a scaffold to which bone fragments are attached using fragment screws. The implant is made from titanium alloy (Ti-6Al-4V ELI)

and Nitinol.

## **Substantial Equivalence:**

Conventus Orthopaedics has demonstrated that, for purposes of FDA's regulation of medical devices, the Conventus PRS<sup>TM</sup> System is substantially equivalent to the following devices that have been previously cleared by the FDA:

- Primary predicate: Synthes T-Plate (Pre-Amendment)
- Synthes Elastic Intramedullary Nail System (K042135)
- Conventus DRS<sup>TM</sup> System (K102689 and K131552)

This finding is supported by the following pre-clinical tests that have been performed:

- Static and cyclic axial/bend testing
- Static and cyclic torsional testing
- Screw pullout testing
- Corrosion testing
- Wear testing
- Nickel ion release testing
- Surface analysis testing
- Nitinol phase composition
- Nitinol transition temperature (A<sub>f</sub>)
- Biocompatibility testing
- Animal Testing
- MRI Testing

The results demonstrate that the PRS<sup>TM</sup> System is substantially equivalent to the legally marketed predicate devices.