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**510(k) Summary**  
**For**  
**Verify® 270FP Challenge Pack**

MAR 10 2011

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Submission Date: March 10, 2011

**K103053/S001 STERIS Response to 3/10/11 Request for Clarification  
Verify 270FP Challenge Pack**

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**1. Device Name**

Indicator Pack Model: Verify® 270FP Challenge Pack  
Common Name: Chemical Indicator  
Classification Name: Physical/chemical sterilization process indicator (21 CFR 880.2800 (b), Product Code JOJ).

**2. Predicate Device**

- STERIS Verify® Challenge Pack (Model 270F 4) – K073683
- Getinge ChemSix Test Pack – K080136

**3. Device Description**

The proposed Verify® 270FP Challenge Pack consists of three emulating indicator inks situated on a test sheet surrounded by a steam penetration barrier. The indicator inks on the proposed Verify® 270FP Challenge Pack test sheet change from yellow to blue/purple color when exposed to saturated steam at 270°F (132°C) for the following times.

- 4 minute indicator – The 4 minute indicator ink on the Verify® 270FP Challenge Pack can be used to monitor a 4 minute SFPP (steam-flush pressure-pulse) and pre-vacuum steam sterilization cycle.
- 10 minute indicator – The 10 minute indicator ink on the Verify® 270FP Challenge Pack can be used to monitor a 10 minute pre-vacuum steam sterilization cycle.
- 20 minute indicator – The 20 minute indicator ink on the Verify® 270FP Challenge Pack can be used to monitor a 20 minute pre-vacuum steam sterilization cycle.

The process indicator outside of the packs undergoes a visual color change from pink to dark purple when exposed to steam in a temperature range of 250°F (121°C) to 275°F (135°C).

**4. Intended Use**

The Verify® 270FP Challenge Pack is a test pack consisting of three emulating indicator inks situated on a test sheet surrounded by a steam penetration barrier,

**K103053/S001 STERIS Response to 3/10/11 Request for Clarification  
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intended for use in SFPP (steam-flush pressure-pulse) and pre-vacuum steam sterilization. The Verify<sup>®</sup> 270FP Challenge Pack indicators change color from yellow to blue/purple when exposed to the following conditions at 270°F (132°C):

- 4 minute indicator - SFPP and pre-vacuum steam sterilization for 4 minutes.
- 10 minute indicator - Pre-vacuum steam sterilization for 10 minutes.
- 20 minute indicator - Pre-vacuum steam sterilization for 20 minutes.

**5. Description of Safety and Substantial Equivalence**

The proposed and predicate devices are all single use indicator test packs for use in steam sterilization cycles. The differences between the proposed Verify<sup>®</sup> 270FP Challenge Pack and predicate devices are limited to differences in design, materials and parameters of the sterilization cycles these indicator test packs are designed to monitor. These differences do not raise any new issues of safety or efficacy.

**6. Performance Testing**

Performance testing was conducted to verify that the proposed emulating indicator inks within the test pack meet the requirements for Class 6 indicators as defined in ANSI/AAMI ISO 11140-1:2005 using a resistometer to ANSI/AAMI/ISO 18472.

Further testing was conducted to demonstrate the efficacy of the barrier material using a 16-towel test pack with biological indicators as a reference. The predicate test packs were included in this testing.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

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

Mr. Robert Sullivan  
Senior Director, Regulatory Affairs  
STERIS Corporation  
5960 Heisley Road  
Mentor, Ohio 44060

MAR 10 2011

Re: K103053  
Trade/Device Name: Verify<sup>®</sup> 270FP Challenge Pack  
Regulation Number: 21 CFR 880.2800  
Regulation Name: Sterilization Process Indicator  
Regulatory Class: II  
Product Code: JOJ  
Dated: February 4, 2011  
Received: February 7, 2011

Dear Mr. Sullivan:

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 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); 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 go to

<http://www.fda.gov/AboutFDA/CentersOffices/CDRH/CDRHOffices/ucm115809.htm> for the Center for Devices and Radiological Health's (CDRH's) Office of Compliance. 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 <http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm> 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 Small Manufacturers, International and Consumer Assistance 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,



Anthony Watson, B.S., M.S., M.B.A.  
Director  
Division of Anesthesiology, General Hospital,  
Infection Control and Dental Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure

## Indications for Use

510(k) Number (if known):

Device Name: Verify® 270FP Challenge Pack

Indications For Use:

The Verify® 270FP Challenge Pack is a test pack consisting of three emulating indicator inks situated on a test sheet surrounded by a steam penetration barrier, intended for use in SFPP (steam-flush pressure-pulse) and pre-vacuum steam sterilization. The Verify® 270FP Challenge Pack indicators change color from yellow to blue/purple when exposed to the following conditions at 270°F (132°C):

- 4 minute indicator - SFPP and pre-vacuum steam sterilization for 4 minutes.
- 10 minute indicator - Pre-vacuum steam sterilization for 10 minutes.
- 20 minute indicator - Pre-vacuum steam sterilization for 20 minutes.

Prescription Use \_\_\_\_\_  
(Part 21 CFR 801 Subpart D)

AND/OR

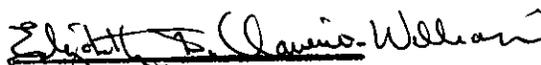
Over-The-Counter Use X  
(21 CFR 801 Subpart C)

**(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)**

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Concurrence of CDRH, Office of Device Evaluation (ODE)

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(Division Sign-Off)  
Division of Anesthesiology, General Hospital  
Infection Control and Dental Devices  
510(k) Number: K103053