



February 5, 2018

Inari Medical, Inc.  
Mr. Eben Gordon  
Vice President, Regulatory Affairs and Quality Assurance  
9272 Jeronimo Rd., Suite 124  
Irvine, California 92618

Re: K173672

Trade/Device Name: FlowTrieve Retrieval/Aspiration System  
Regulation Number: 21 CFR 870.5150  
Regulation Name: Embolectomy Catheter  
Regulatory Class: Class II  
Product Code: DXE  
Dated: January 24, 2018  
Received: January 26, 2018

Dear Mr. Gordon:

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.

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

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<https://www.fda.gov/MedicalDevices/DeviceRegulationandGuidance/>) and CDRH Learn (<http://www.fda.gov/Training/CDRHLearn>). 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 (<http://www.fda.gov/DICE>) for more information or contact DICE by email ([DICE@fda.hhs.gov](mailto:DICE@fda.hhs.gov)) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Kenneth J. Cavanaugh -S

for

Bram D. Zuckerman, M.D.  
Director  
Division of Cardiovascular Devices  
Office of Device Evaluation  
Center for Devices and Radiological Health

Enclosure

## Indications for Use

510(k) Number (if known)

K173672

Device Name

FlowTrieve Retrieval/Aspiration System

Indications for Use (Describe)

The FlowTrieve Retrieval/Aspiration System consists of the FlowTrieve Catheter, Aspiration Guide Catheter, and Retraction Aspirator. The FlowTrieve Retrieval/Aspiration System is indicated for:

- The non-surgical removal of emboli and thrombi from blood vessels.
- Injection, infusion, and/or aspiration of contrast media and other fluids into or from a blood vessel.

The FlowTrieve Retrieval/Aspiration System is intended for use in the peripheral vasculature.

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.

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**510(k) SUMMARY**

Date prepared	November 28, 2017
Name	Inari Medical, Inc. 9272 Jeronimo Road, Suite 124 Irvine, CA 92618 949.600.8433 x114
Contact person	Eben Gordon Vice President, Regulatory Affairs & Quality Assurance
Trade name	FlowTrieve Retrieval/Aspiration System
Common name	Embolectomy catheter
Regulation name	Embolectomy catheter
Classification number	21 CFR 870.5150
Product code	DXE
Regulatory class	II
Predicate device	Inari FlowTrieve Retrieval/Aspiration System (K162970)
Reference device	Inari ClotTrieve Thrombectomy System (K163549)
Description	<p>The FlowTrieve Retrieval/Aspiration System is a single-use over-the-wire catheter-based system for the minimally invasive treatment of thromboemboli in the peripheral vasculature. The system is comprised of three main components packaged separately:</p> <ul style="list-style-type: none"><li>• Aspiration Guide Catheter</li><li>• FlowTrieve Catheter (available in 3 sizes: 6-10 mm, 11-14 mm, and 15-18 mm)</li><li>• Retraction Aspirator</li></ul> <p>The FlowTrieve Catheter is inserted through the Aspiration Guide Catheter and advanced to the thrombus. Self-expanding wireform disks are deployed to engage thrombus by retracting the outer delivery catheter. The hand-lever operated Retraction Aspirator simultaneously aspirates fluids and retracts the FlowTrieve Catheter with thrombus into the Aspiration Guide Catheter to capture clot and restore blood flow.</p>
Indications for Use	<p>The FlowTrieve Retrieval/Aspiration System consists of the FlowTrieve Catheter, Aspiration Guide Catheter, and Retraction Aspirator. The FlowTrieve Retrieval/Aspiration System is indicated for:</p> <ul style="list-style-type: none"><li>• The non-surgical removal of emboli and thrombi from blood vessels.</li><li>• Injection, infusion, and/or aspiration of contrast media and other fluids into or from a blood vessel.</li></ul> <p>The FlowTrieve Retrieval/Aspiration System is intended for use in the peripheral vasculature.</p>

Device modifications      The modification to the FlowTrievers Retrieval/Aspiration System are primarily intended to streamline the user interaction with the device changes and include the following:

- Replacement of the hemostasis valve seal with a user actuated hemostasis valve seal in the Aspiration Guide Catheter's proximal hub.
- Addition of a stopcock in the sideport tubing.
- Elimination of the Valve Dilator, Aspiration Insert, Flush Port Adapter, and tubing clamp components.

Summary of substantial equivalence      There is no change of intended use or fundamental scientific technology between the proposed and predicate devices.

#### **Non-Clinical Testing**

In accordance with the Design Failure Modes and Effects Analysis, verification and validation testing supported the substantial equivalence of the modified FlowTrievers Retrieval/Aspiration System. This testing demonstrated compliance with relevant product specifications. These tests included:

- Visual and Dimensional Inspections
- Guidewire Compatibility Verification
- Leakage Verification, AGC Hemostasis Valve And Accessory Devices
- Air Leakage From AGC Hemostasis Valve During Syringe Pullback
- Air Leakage During Syringe Pullback
- Vacuum Testing
- Retraction Force Testing
- Push Button Force
- Retraction Aspirator Device Retraction
- Simulated Use, Track and Tensile
- Stopcock Torque Testing
- Burst Testing of Hemostasis Valve and Stopcock

Clinical testing was not required for the determination of substantial equivalence.

#### **Conclusion**

Test results demonstrated that all acceptance criteria were met; therefore, the device conforms to established product specifications and intended use. Based upon the same intended use and principle of operation, technology, and non-clinical testing it is concluded that the modified FlowTrievers Retrieval/Aspiration System is substantially equivalent to the predicate device.