



October 26, 2018

Cook Incorporated
Jessica Swafford
Regulatory Affairs Specialist
750 Daniels Way
Bloomington, Indiana 47402

Re: K180286
Trade/Device Name: Polyethylene Catheter
Regulation Number: 21 CFR 870.1200
Regulation Name: Diagnostic Intravascular Catheter
Regulatory Class: Class II
Product Code: DQO
Dated: September 20, 2018
Received: September 21, 2018

Dear Jessica Swafford:

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/CombinationProducts/GuidanceRegulatoryInformation/ucm597488.htm>); 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 <http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm>.

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) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Lydia S. Glaw -S
2018.10.26 15:13:46 -04'00'

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)

K180286

Device Name

Polyethylene Catheter

Indications for Use (Describe)

The Polyethylene Catheter is intended for use in angiographic procedures.

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)

PLEASE DO NOT WRITE BELOW THIS LINE – CONTINUE ON A SEPARATE PAGE IF NEEDED.

FOR FDA USE ONLY

Concurrence of Center for Devices and Radiological Health (CDRH) (Signature)

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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“An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB number.”

Polyethylene Catheter
Traditional 510(k) Summary
21 CFR §807.92

Submitter Information

Applicant:	Cook Incorporated
Address:	750 Daniels Way Bloomington, IN 47404
Contact:	David E. Chadwick
Email:	RegSubmissions@CookMedical.com
Contact Phone Number:	812-335-3575 ext. 102330
Contact Fax Number:	812-332-0281
Date Prepared:	20 September 2018

Device Information

Trade Name:	Polyethylene Catheter
Common Name:	Diagnostic intravascular catheter
Classification Name:	Catheter, Intravascular, Diagnostic DQO (21 CFR §870.1200)

Predicate Device

The predicate device is the Cook Incorporated Slip-Cath[®] Beacon[®] Tip Catheter cleared under 510(k) number K122937. The predicate device is manufactured in lengths of 60 to 150 centimeters and in diameters of 4.0 to 6.5 French. The shaft of the catheter is compatible with an 0.035 or 0.038 inch wire guide. These catheters are manufactured in a variety of distal tip configurations.

Reference Device

Cook has utilized the Angiodynamics Soft-Vu[®] Angiographic Catheter (K161596) as a reference device, which is available in lengths of 25 to 140 centimeters, to support some

of the shorter lengths (30 to 50 centimeters) of the subject device, the Polyethylene Catheter. Cook has also utilized the Medtronic Pro-Flo Pigtail Angiographic Catheter (K960056) as a reference device, which is available in 6.0 and 7.0 French sizes, to support the 6.7 French size of the subject device.

Comparison to Predicate

It has been demonstrated that the subject Polyethylene Catheter and the predicate device are substantially equivalent in terms of intended use, duration of use, principles of operation, fundamental technological characteristics, and insertion method. The design, dimensions, manufacturing methods, and materials of the subject device are similar to those of the predicate device. The differences between the subject device and the predicate device do not raise new questions of safety and effectiveness as demonstrated by performance and biocompatibility testing.

Device Description

The Polyethylene Catheter, subject of this submission, is a sterile, single use device designed for use in angiographic procedures. The Polyethylene Catheter is available in 5.0, 6.7, 7.1, and 7.2 French sizes and is manufactured in lengths of 30 to 100 centimeters. Each configuration includes a luer lock adapter and a single lumen shaft.

Intended Use

The Polyethylene Catheter is intended for use in angiographic procedures.

Test Data

The Polyethylene Catheter, subject of this submission, was subjected to the applicable testing listed below to assure reliable design and performance under the testing parameters. Performance and biocompatibility testing was conducted in accordance with applicable FDA guidance documents to confirm the reliable performance of critical device characteristics.

- Biocompatibility testing – Testing (i.e., cytotoxicity, sensitization, intracutaneous reactivity, systemic toxicity, pyrogenicity, hemocompatibility, complement activation, *in vivo* thrombogenicity, and partial thromboplastin time) demonstrated that the device is biocompatible for the intended use. In

conformance with the applicable sections of ANSI AAMI ISO 10993-1:2009(R)2013, the predetermined acceptance criteria were met.

- Tensile Testing of the Hub-to-Shaft Bond – Testing verified that, under proper clinical use of the catheter, the peak load value of the hub-to-shaft connection is in accordance with the methods of BS EN ISO 10555-1:2013, Annex B. The predetermined acceptance criterion was met.
- Tensile Testing of the Sideported Area – Testing verified that, under proper clinical use of the catheter, the peak load value of the sideported area of the shaft is in accordance with the methods of BS EN ISO 10555-1:2013, Annex B. The predetermined acceptance criterion was met.
- Liquid Leakage Testing – Testing verified that, under proper clinical use of the catheter, there will be no liquid leakage when tested in accordance with BS EN ISO 10555-1:2013, Annex C. The predetermined acceptance criterion was met.
- Air Leakage Testing – Testing verified that, under proper clinical use of the catheter, there will be no air leakage when tested in accordance with BS EN ISO 10555-1:2013, Annex D. The predetermined acceptance criterion was met.
- Static Burst Testing – Testing successfully characterized the catastrophic failure pressure for the catheter when tested in accordance with BS EN ISO 10555-1:2013, Annex F.
- Dimensional Verification Testing – Testing verified that the dimensional requirements of the subject device are within a specified tolerance. The predetermined acceptance criteria were met.
- Hub Pressure Testing – Testing successfully characterized the hub pressure, when tested at maximum flow rate, and to verify that it does not exceed the static burst pressure.

Conclusions

The results of testing provide reasonable assurance that the Polyethylene Catheter has been designed so that it conforms to the requirements of its intended use. The evidence demonstrates that the subject device is substantially equivalent to the predicate device, the Cook Incorporated Slip-Cath[®] Beacon[®] Tip Catheter (K122937), and does not raise new questions of safety or effectiveness.