January 31, 2019

STERIS Corporation
Marcia Benedict
Senior Director, Regulatory Affairs
5976 Heisley Rd
Mentor, Ohio 44060

Re: K182827
Trade/Device Name: SYSTEM 1 endo Liquid Chemical Sterilant Processing System, Model 6900
Regulation Number: 21 CFR 880.6885
Regulation Name: Liquid Chemical Sterilants/High Level Disinfectants
Regulatory Class: Class II
Product Code: MED
Dated: January 7, 2019
Received: January 8, 2019

Dear Marcia Benedict:

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,

Clarence W. Murray Iii III -S

For Tina Kiang, Ph.D.
Acting Director
Division of Anesthesiology,
General Hospital, Respiratory,
Infection Control, and Dental Devices
Office of Device Evaluation
Center for Devices and Radiological Health

Enclosure

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Food and Drug Administration

Indications for Use

Form Approved: OMB No. 0910-0120
Expiration Date: 06/30/2020
See PRA Statement below.

510(k) Number *(if known)*
K182827

Device Name
SYSTEM 1 endo Liquid Chemical Sterilant Processing System, Model P6900

Indications for Use *(Describe)*
The SYSTEM 1 endo Liquid Chemical Sterilant Processing System is intended for liquid chemical sterilization of cleaned, immersible, and reusable semi-critical heat-sensitive medical devices and their accessories in healthcare facilities.

The SYSTEM 1 endo Processor automatically dilutes the S40 Sterilant Concentrate to its use dilution (> 1820 mg/L peracetic acid), liquid chemically sterilizes the load during a controlled 6-minute exposure at 45.5 to 60°C and rinses the load with 0.2 micron filtered water.

The SYSTEM 1 endo Processor uses only S40 Sterilant Concentrate to liquid chemically sterilize medical devices.

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
For
SYSTEM 1 endo
Liquid Chemical Sterilant Processing System
Model P6900

STERIS Corporation
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Submission Date: January 31, 2019

Premarket Notification Number: **K182827**

1. Device Name

Trade Name:	**SYSTEM 1 endo Liquid Chemical Sterilant Processing System, Model P6900**
Device Class:	Class 2
Common/usual Name:	Liquid Chemical Sterilizer
Classification Name:	Sterilant, Medical devices, Liquid Chemical Sterilants/Disinfectants
Classification Number:	21 CFR 880.6885
Product Code:	MED

2. Predicate Device

The predicate device is the SYSTEM 1 endo Liquid Chemical Sterilant Processing System, Model P6800 cleared under K173256.

3. Description of Device

The SYSTEM 1 endo Liquid Chemical Sterilant Processing System is a liquid chemical sterilization system, utilizing peracetic acid to process totally immersible, cleaned semi-critical heat-sensitive medical devices and their accessories. The system consists of the SYSTEM 1 endo LCS Processor and S40 Sterilant Concentrate, interchangeable Processing Trays/Containers, and Quick Connects.

This submission describes modifications to the processor's user interface and controller, to be introduced in Model P6900. The modifications will provide several user convenience features as compared to the originally cleared processor, Model P6800. The advantages for users include an intuitive touchscreen display, a barcode scanner, and the ability to electronically save and download cycle data for facility records. The P6900 model utilizes an updated electronic controller and suitable software, while providing cycles for liquid chemical sterilization (LCS) and system diagnostics identical to those of the original device. The modified SYSTEM 1 endo Processor, which is computer controlled and continually monitored, provides electronic documentation of each cycle. An external printer is available for printed records, if preferred.

The SYSTEM 1 endo Processor (whether Model P6800 or P6900) is an automated, self-contained device that uses S40 Sterilant Concentrate to create and maintain the conditions necessary for liquid chemical sterilization in six (6) minutes. After liquid chemical sterilant processing, the liquid chemically sterilized articles are rinsed

with 0.2 micron filtered potable water and are ready for use, or may be prepared for storage.

The SYSTEM 1 endo Processor uses only S40 Sterilant Concentrate. Upon loading the single-use cup, the active ingredient in S40 – peracetic acid – is combined with inert ingredients (builders) to form a use dilution which inhibits corrosion of metals, polymers and other materials.

The interchangeable processing trays/containers are made to accommodate a variety of semi-critical instrument types and models. Each container is designed to maintain instruments in position while specific SYSTEM 1 endo Quick Connects, if required, facilitate delivery of the sterilant use-solution and rinse water to internal channels. **Table 1** compares the proposed and predicate devices.

4. Indications for Use

The SYSTEM 1 endo Liquid Chemical Sterilant Processing System is intended for liquid chemical sterilization of cleaned, immersible, and reusable semi-critical heat-sensitive medical devices and their accessories in healthcare facilities.

The SYSTEM 1 endo Processor automatically dilutes the S40 Sterilant Concentrate to its use dilution (> 1820 mg/L peracetic acid), liquid chemically sterilizes the load during a controlled 6-minute exposure at 45.5 to 60°C and rinses the load with 0.2 micron filtered water.

The SYSTEM 1 endo Processor uses only S40 Sterilant Concentrate to liquid chemically sterilize medical devices.

5. Technological Characteristics Comparison Table

The SYSTEM 1 endo Liquid Chemical Sterilant Processing System is the same as the predicate device except for the specific differences described in this submission, identified in **Table 1** below.

Table 2 is provided to demonstrate that the S40 Sterilant Concentrate in the modified processor is unchanged.

Appropriate changes are made to the processor's software and labeling as a result of the different design features identified.

Table 1. Processor Comparison Table

Feature	Proposed Device SYSTEM 1 endo Processor Model P6900 – K182827	Predicate Device SYSTEM 1 endo Processor Model P6800 – K173256	Comparison
Intended Use **Indications for Use**	The SYSTEM 1 endo Liquid Chemical Sterilant Processing System is intended for liquid chemical sterilization of cleaned, immersible, and reusable semi-critical heat-sensitive medical devices and their accessories in healthcare facilities. The SYSTEM 1 endo Processor automatically dilutes the S40 Sterilant Concentrate to its use dilution (> 1820 mg/L peracetic acid), liquid chemically sterilizes the load during a controlled 6-minute exposure at 45.5 to 60°C, and rinses the load with 0.2 micron filtered water. The SYSTEM 1 endo Processor uses only S40 Sterilant Concentrate to liquid chemically sterilize medical devices.	The SYSTEM 1 endo Liquid Chemical Sterilant Processing System is intended for liquid chemical sterilization of cleaned, immersible, and reusable semi-critical heat-sensitive medical devices and their accessories in healthcare facilities. The SYSTEM 1 endo Processor automatically dilutes the S40 Sterilant Concentrate to its use dilution (> 1820 mg/L peracetic acid), liquid chemically sterilizes the load during a controlled 6-minute exposure at 45.5 to 60°C, and rinses the load with 0.2 micron filtered water. The SYSTEM 1 endo Processor uses only S40 Sterilant Concentrate to liquid chemically sterilize medical devices.	Identical
Operating Principles / Technology	A microprocessor controlled unit with interchangeable processing trays/containers. The processor lid opens to reveal the processing chamber in which the load is placed. Devices with internal lumens are interfaced with the processor using connectors, i.e. Quick Connects. S40 Sterilant is placed in a specialized compartment and when the processor fills with water, it creates the sterilant use dilution from the single use sterilant cup. The processor monitors and controls the use dilution temperature and contact time. The processor automatically rinses the load with 0.2 micron filtered water to remove sterilant residuals.	A microprocessor controlled unit with interchangeable processing trays/containers. The processor lid opens to reveal the processing chamber in which the load is placed. Devices with internal lumens are interfaced with the processor using connectors, i.e. Quick Connects. S40 Sterilant is placed in a specialized compartment and when the processor fills with water, it creates the sterilant use dilution from the single use sterilant cup. The processor monitors and controls the use dilution temperature and contact time. The processor automatically rinses the load with extensively treated filtered water to remove sterilant residuals.	Identical

Feature	Proposed Device SYSTEM 1 endo Processor Model P6900 – K182827	Predicate Device SYSTEM 1 endo Processor Model P6800 – K173256	Comparison
Process Parameters	Standardized cycle parameters cannot be altered by operator. The critical process parameters are: • Use dilution contact time • Use dilution temperature • Peracetic acid concentration • Integrity of the internal water filter (tested by the system)	Standardized cycle parameters cannot be altered by operator. The critical process parameters are: • Use dilution contact time • Use dilution temperature • Peracetic acid concentration • Integrity of the internal water filter (tested by the system)	Identical
Process Monitors:	• Electronic and/or printed cycle records document successful cycle completion or identify fault if cycle aborts • Alarms if thermocouples indicate temperature out of specification • Alarms if pressure switch indicates that high pressure pump is not operating • Alarms if conductivity probe indicated conductivity specification not met • Alarms if pressure transducer indicates circulation pressure is out of specification in Diagnostic Cycle • Alarms if pressure transducer indicates internal water filter failed integrity test in Diagnostic Cycle	• Cycle printout documents successful cycle completion or identifies fault if cycle aborts • Alarms if thermocouples indicate temperature out of specification • Alarms if pressure switch indicates that high pressure pump is not operating • Alarms if conductivity probe indicated conductivity specification not met • Alarms if pressure transducer indicates circulation pressure is out of specification in Diagnostic Cycle • Alarms if pressure transducer indicates internal water filter failed integrity test in Diagnostic Cycle	Identical, except cycle records are electronic
Design Features	• Microprocessor controlled unalterable and standardized liquid chemical sterilization and Diagnostic cycles • Intended for use only with S40 Sterilant Concentrate • Automated dilution and delivery of S40 Sterilant • Processor provides 0.2 micron filtered water for liquid chemical sterilization and rinsing • Make-up air for processor during drain sequences is	• Microprocessor controlled unalterable and standardized liquid chemical sterilization and Diagnostic cycles • Intended for use only with S40 Sterilant Concentrate • Automated dilution and delivery of S40 Sterilant • Processor provides 0.2 micron filtered water for liquid chemical sterilization and rinsing • Make-up air for processor during drain sequences is	The proposed device uses an updated controller and its respective software to provide identical processing parameters. The proposed device uses an updated touchscreen display, has a

Feature	Proposed Device SYSTEM 1 endo Processor Model P6900 – K182827	Predicate Device SYSTEM 1 endo Processor Model P6800 – K173256	Comparison
	filtered through a 0.2 micron membrane air filter • Includes a barcode scanner; employs touchscreen display interface; has USB drive for electronic cycle download; facilitates use of a web-based data management system. • Separate, optional printer	filtered through a 0.2 micron membrane air filter • Has no barcode scanner, employs a membrane touch panel interface and small display, has no USB drive. • Includes an onboard printer for cycle information	barcode reader and USB drive for electronic cycle records, and facilitates use of a web-based data mgmt system. Use of printer is optional.
Cycle Parameters			**Comparison**
Incoming water temp.	≥ 43°C	≥ 43°C	Identical
Temperature to start sterilant exposure	≥ 46°C	≥ 46°C	Identical
Temperature alarm point during LCS exposure	< 45.5 or > 60°C	< 45.5 or > 60°C	Identical
Temperature range of typical LCS cycle	46 - 55°C	46 - 55°C	Identical
Exposure Time – S40 use dilution	6 minutes	6 minutes	Identical
Rinse water preparation	Hot potable tap water • is pre-filtered • is filtered through 0.2 micron bacterial retentive membrane filter	Hot potable tap water • is pre-filtered • is filtered through 0.2 micron bacterial retentive membrane filter	Identical
Number of rinses	2	2	Identical
Air Purge	Aids in removing excess water from instrument lumens after rinsing	Aids in removing excess water from instrument lumens after rinsing	Identical
Internal Water Filter Integrity Test	Conducted during the Diagnostic cycle	Conducted during the Diagnostic cycle	Identical
Approximate Cycle Time	18 - 20 minutes	18 - 20 minutes	Identical

Feature	Proposed Device SYSTEM 1 endo Processor Model P6900 – K182827	Predicate Device SYSTEM 1 endo Processor Model P6800 – K173256	Comparison
Diagnostic Cycle	Performs 14 tests on processor's systems confirming proper function. Recommended to perform each day of use. After a failed Diagnostic cycle, a liquid chemical sterilization cycle cannot be performed until the problem is rectified and a successful Diagnostic cycle has been completed.	Performs 14 tests on processor's systems confirming proper function. Recommended to perform each day of use. After a failed Diagnostic cycle, a liquid chemical sterilization cycle cannot be performed until the problem is rectified and a successful Diagnostic cycle has been completed.	Identical
Accessories			**Comparison**
Sterilant	Uses S40 Sterilant Concentrate – see **Table 2**	Uses S40 Sterilant Concentrate – see **Table 2**	Identical
Processing Trays and Containers	Uses interchangeable processing trays/containers • Universal Flex Processing Tray • General Processing Container & Tray • Directed Flow Processing Container & Tray • Flexible Endoscope Processing Container & Tray • Ultrasound Processing Tray	Uses interchangeable processing trays/containers • Universal Flex Processing Tray • General Processing Container & Tray • Directed Flow Processing Container & Tray • Flexible Endoscope Processing Container & Tray • Ultrasound Processing Tray	Identical
Quick Connects	Uses Quick Connects to attach instrument lumens to the Tray/Container ports	Uses Quick Connects to attach instrument lumens to the Tray/Container ports	Identical
Chemical Indicator	VERIFY Chemical Indicator for S40 Sterilant is available for use in SYSTEM 1 endo LCSPS	VERIFY Chemical Indicator for S40 Sterilant is available for use in SYSTEM 1 endo LCSPS	Identical
Spore Test Strip	VERIFY Spore Test Strip for S40 Sterilant for use in SYSTEM 1 endo LCSPS	VERIFY Spore Test Strip for S40 Sterilant for use in SYSTEM 1 endo LCSPS	Identical
Operator Maintenance	Periodic replacement of water filters and air filter. Periodic replacement of printer tape, if using the external printer option.	Periodic replacement of water filters and air filter. Periodic replacement of printer tape.	Identical, excepting that the printer is an external option

Table 2. S40 Sterilant Concentrate Comparison Table

Feature	S40 Sterilant Concentrate in S1 endo LCSPS Model P6900 – K182827	S40 Sterilant Concentrate in S1 endo LCSPS Model P6800 - K173256	Comparison
Intended Use	For use in S1E or S1 endo LCSPS	For use in S1E or S1 endo LCSPS	Identical
Germicidal claim	Liquid Chemical Sterilant	Liquid Chemical Sterilant	Identical
Exposure Time	6 minutes	6 minutes	Identical
Use Temperature	45.5 - 60ºC – allowable range Potency and simulated use evaluations conducted at ≤ 43°C	45.5 - 60ºC – allowable range Potency and simulated use evaluations conducted at ≤ 43°C	Identical
Reuse	Single use	Single use	Identical
Human Factors	Ready to use. Container is opened and diluted by the processor, limiting user exposure to the sterilant concentrate	Ready to use. Container is opened and diluted by the processor, limiting user exposure to the sterilant concentrate	Identical
Active Ingredient	35% peroxyacetic (peracetic) acid automatically diluted for use in the Processor	35% peroxyacetic (peracetic) acid automatically diluted for use in the Processor	Identical
Mode of Action	It is believed that peracetic acid exerts its germicidal effect by several mechanisms: -oxidizing sulfhydral and sulfur bonds in proteins and enzymes, particularly in the cell walls [1] -hydroxyl radicals produced from PAA are bactericidal [2] -PAA damages the viral capsid and viral nucleic acid[3,4]	It is believed that peracetic acid exerts its germicidal effect by several mechanisms: -oxidizing sulfhydral and sulfur bonds in proteins and enzymes, particularly in the cell walls[1] -hydroxyl radicals produced from PAA are bactericidal[2] -PAA damages the viral capsid and viral nucleic acid[3.4]	Identical
Rinses	2 equivalent automated rinses with pre-filtered, dual 0.2 micron membrane filtered, potable hot water	2 equivalent automated rinses with pre-filtered, UV irradiated, dual 0.1 micron membrane filtered, potable hot water	Identical

[1] Block, S. ed., Disinfection, Sterilization, and Preservation. 5th edition, 2001
[2] Clapp et al., Free Rad. Res., (1994) 21:147-167
[3] Maillard et. al., J. Med. Microbiol (1995) 42:415-420
[4] Maillard et. al., J. Appl Bacteriol (1996) 80:540-554

Feature	S40 Sterilant Concentrate in S1 endo LCSPS Model P6900 – K182827	S40 Sterilant Concentrate in S1 endo LCSPS Model P6800 - K173256	Comparison
Sporicidal Activity of Disinfectants AOAC Official Method 966.04	Meets efficacy requirements[5] *Bacillus subtilis* *Clostridium sporogenes* Testing conducted *in vitro*	Meets efficacy requirements[5] *Bacillus subtilis* *Clostridium sporogenes* Testing conducted *in vitro*	Identical
Confirmatory Sporicidal Activity of Disinfectants AOAC Official Method 966.04	Meets efficacy requirements[5] *Bacillus subtilis* *Clostridium sporogenes* Testing conducted *in vitro*	Meets efficacy requirements[5] *Bacillus subtilis* *Clostridium sporogenes* Testing conducted *in vitro*	Identical
Fungicidal Activity of Disinfectants AOAC Official Method 955.17	Solution is fungicidal *Trichophyton mentagrophytes* Testing conducted *in vitro*	Solution is fungicidal *Trichophyton mentagrophytes* Testing conducted *in vitro*	Identical
Use Dilution Method AOAC, Official Methods 955.14, 955.15, 964.02	Solution is bactericidal *Salmonella choleraesuis* *Staphylococcus aureus* *Pseudomonas aeruginosa* Testing conducted *in vitro*	Solution is bactericidal *Salmonella choleraesuis* *Staphylococcus aureus* *Pseudomonas aeruginosa* Testing conducted *in vitro*	Identical
EPA Virucidal Testing (DIS/TSS-7, Nov. 1981)	Solution is virucidal Herpes simplex Type 1 Adenovirus Type 5 Poliovirus Type 1 Testing conducted *in vitro*	Solution is virucidal Herpes simplex Type 1 Adenovirus Type 5 Poliovirus Type 1 Testing conducted *in vitro*	Identical
Tuberculocidal Activity of Disinfectants AOAC Official Method 965.12	Not performed; a quantitative suspension Tuberculocidal test was conducted	Not performed; a quantitative suspension Tuberculocidal test was conducted	Identical

[5] McDonnell et al., J. AOAC International (2000) 83:269-275

Feature	S40 Sterilant Concentrate in S1 endo LCSPS Model P6900 – K182827	S40 Sterilant Concentrate in S1 endo LCSPS Model P6800 - K173256	Comparison
Tuberculocidal Activity Ascenzi Quantitative Suspension Test	Solution is tuberculocidal *Mycobacterium terrae* testing conducted *in vitro*	Solution is tuberculocidal *Mycobacterium terrae* testing conducted *in vitro*	Identical
Simulated Use	Meets efficacy requirement. $\geq$ 6 $\log^{10}$ reduction *Geobacillus stearothermophilus* spores in a manual application.	Meets efficacy requirement. $\geq$ 6 $\log^{10}$ reduction *Geobacillus stearothermophilus* spores in a manual application.	Identical
Clinical In Use	No surviving microorganisms on representative medical devices tested in S1 endo LCSPS	No surviving microorganisms on representative medical devices tested in S1 endo LCSPS	Identical
Cytotoxicity Device Extracts	Two Processor controlled rinses with pre-filtered, dual 0.2 micron filtered potable water effectively reduce sterilant residues to non-cytotoxic levels.	Two Processor controlled rinses with pre-filtered, dual 0.2 micron filtered potable water effectively reduce sterilant residues to non-cytotoxic levels.	Identical
Residue Reduction	Two Processor controlled rinses with pre-filtered, dual 0.2 micron filtered potable water effectively reduce sterilant residues to safe levels.	Two Processor controlled rinses with pre-filtered, dual 0.2 micron filtered potable water effectively reduce sterilant residues to safe levels.	Identical
Material Compatibility	Compatible with medical devices as established by testing finished medical devices through 300 cycles. No functional changes occurred to devices. Some materials show cosmetic changes such as fading of external markings (yet all remained legible) and bleaching of black anodized aluminum without harm to the base material.	Compatible with medical devices as established by testing finished medical devices through 300 cycles. No functional changes occurred to devices. Some materials show cosmetic changes such as fading of external markings (yet all remained legible) and bleaching of black anodized aluminum without harm to the base material.	Identical

6. Summary of Non-Clinical Performance Testing

Performance testing was conducted to evaluate the modified device and the results are summarized in **Table 3**.

Table 3. Performance Testing Summary Table

Test	Acceptance Criteria	Result
Electrical Safety Conformance and EMC	UL 61010-1 Safety Requirements for Electrical Equipment for Measurement, Control, and Laboratory Use – Part 1: General Requirements, 3rd Edition UL 61010-2-040 Safety Requirements for Electrical Equipment for Measurement, Control, and Laboratory Use – Part 2-040: Particular Requirements for Sterilizers and Washer-Disinfectors Used to Treat Medical Materials, 2nd Edition IEC 61326-1:2012 Electrical equipment for measurement, control and laboratory use – EMC Requirements – Part 1: General Requirements	PASS
Cycle Performance Qualification	All cycle specifications were met for three (3) Liquid Chemical Sterilization and three (3) Diagnostic Cycles.	PASS
Software Validation	The software that controls the system was validated and determined to operate effectively and as designed.	PASS

7. Conclusion

Based on the intended use, technological characteristics and non-clinical performance data, the subject device is as safe, as effective, and performs as well as or better than the legally marketed predicate device (K173256).