

## 510(k) SUMMARY

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**A. Submitter Information:**

Submitter: MEDCOMP®  
1499 Delp Drive  
Harleysville, PA 19438  
(215) 256-4201 Telephone  
(215) 256-1787 Fax  
Contact: Florence A. Caikoski  
Date Prepared: January 28, 2002

**B. Trade Name:** Medcomp Ash Split-Cath II  
**Common Name:** Hemodialysis Catheter, Implanted  
**Classification:** 78 MSD  
**C.F.R. Section:** 876.5540

**C. Predicate Device:** K972207 Medcomp Ash Split-Cath  
K012562 Medcomp 14.5F Double  
Lumen Hemodialysis Catheter

**D. Device Description:**

The Medcomp Ash Split-Cath II is a polyurethane, double lumen catheter used to remove and return blood through two-segregated lumen passages. Both lumens are "D" shaped, tapered at the distal tip, with eight side holes. The distal venous lumen extends beyond the arterial lumen to reduce recirculation. The fixed polyester cuff allows for tissue ingrowth for long term placement.

The arterial and venous lumens are designed to be split, or peeled apart, prior to insertion to provide two free-floating lumens within the vessel. The side holes are orientated to allow 360-degree arterial uptake and venous return. The lumens are connected to the extensions via a soft pliable hub with suture wing. Red and blue luer connectors and clamps identify the arterial and venous extensions. Priming volume information is printed on an identification ring housed within the extension line clamp.

**E. Intended Use:**

The Medcomp Ash Split-Cath II is indicated for use in attaining long-term vascular access for hemodialysis and apheresis. It may be inserted percutaneously and is primarily placed in the internal jugular vein. Alternate insertion site is the subclavian vein.

Catheters greater than 40cm are intended for femoral vein insertion.

**F. Comparison to Predicate Device:**

The technological characteristics of the Ash Split-Cath II are substantially equivalent to the predicate in terms of intended use, insertion method, anatomical location, design, performance, labeling, manufacturing process and method of sterilization.

The design specifications are identical to that of the predicate device. The difference between the proposed device and the predicate is the material formulation of the lumen material and the lumen bonding agent. Although the proposed device and predicate device lumens are manufactured from polyurethane, the material formulations are different.

The indications for use for the proposed device have been expanded to include femoral vein insertion when other means of access have been exhausted or contraindicated.

**G. Performance Data:**

In Vitro performance data for the Medcomp Ash Split Cath II, including tensile strength, joint strength, leakage, recirculation, flow performance, flexural and lumen peel demonstrate that this device is substantially equivalent to the legally marketed Ash Split-Cath I catheter.

Biocompatibility testing on the Ash Split-Cath II demonstrates the new lumen materials meet the requirements of ISO 10993 for a permanent contact device.

Clinical data was not deemed necessary since substantial equivalence is addressed by way of comparison to a legally marketed device.



Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850

MAY 22 2002

Ms. Florence A. Caikoski  
Regulatory Affairs Associate  
MEDCOMP®  
1499 Delp Drive  
HARLEYSVILLE PA 19438

Re: K020465

Trade/Device Name: Ash Split-Cath II, Models ASPC24-2, 14F x 24cm; ASPC28-2, 14F x 28cm; ASPC32-2, 14F x 32cm; ASPC36-2, 14F x 36cm; ASPC40-2, 14F x 40cm; ASPC55-2, 14F x 55cm

Regulation Number: 21 CFR 876.5540

Regulation Name: Blood access device and accessories

Regulatory Class: III

Product Code: 78 MSD

Dated: February 11, 2002

Received: February 12, 2002

Dear Ms. Caikoski:

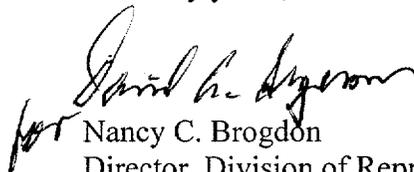
We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 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). You may, therefore, market the device, subject to the general controls provisions of the Act. However, you are responsible to determine that the medical devices you use as components in the kit have either been determined as substantially equivalent under the premarket notification process (Section 510(k) of the act), or were legally on the market prior to May 28, 1976, the enactment date of the Medical Device Amendments. Please note: If you purchase your device components in bulk (i.e., unfinished) and further process (e.g., sterilize) you must submit a new 510(k) before including these components in your kit. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, and labeling, and prohibitions against misbranding and adulteration.

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 (21 CFR Part 807); listing (21 CFR Part 807), labeling (21 CFR Part 801); 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.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market. If you desire specific advice for your device on the labeling regulation (21 CFR Part 801 and additionally Part 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-\_\_\_. Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification"(21 CFR Part 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers, International and Consumer Assistance at its toll free number (800) 638-2041 or (301) 443-6597, or at its Internet address <http://www.fda.gov/cdrh/dsma/dsmamain.html>.

Sincerely yours,



Nancy C. Brogdon  
Director, Division of Reproductive, Abdominal,  
and Radiological Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure

## INDICATIONS FOR USE

510(k) Number:

Device Name: Medcomp Ash Split-Cath II Hemodialysis Catheter

Indications for use:

THE MEDCOMP ASH SPLIT-CATH II IS INDICATED FOR USE IN ATTAINING LONG-TERM VASCULAR ACCESS FOR HEMODIALYSIS AND APHERESIS.

IT MAY BE INSERTED PERCUTANEOUSLY AND IS PRIMARILY PLACED IN THE INTERNAL JUGULAR VEIN. ALTERNATE INSERTION SITES INCLUDE THE SUBCLAVIAN VEIN AS REQUIRED.

CATHETERS GREATER THAN 40cm ARE INTENDED FOR FEMORAL VEIN INSERTION.

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

Concurrence of CDRH, Office of Device Evaluation (ODE)

Prescription Use   ✓    
(Per 21 CFR 801.109)

OR

Over-The-Counter           

(Optional Format 1-2-96)

David G. Seymour  
**(Division Sign-Off)**  
**Division of Reproductive, Abdominal,**  
**and Radiological Devices**  
**510(k) Number**   K020465