

August 7, 2023

STERIS Corporation Jennifer Nalepka Manager, Regulatory Affairs 5960 Heisley Road Mentor, Ohio 44060

Re: K231501

Trade/Device Name: PRO-LITE Sterilization Tray

Regulation Number: 21 CFR 880.6850 Regulation Name: Sterilization Wrap

Regulatory Class: Class II

Product Code: KCT Dated: May 22, 2023 Received: May 24, 2023

Dear Jennifer Nalepka:

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 <u>Federal Register</u>.

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/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products); 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 https://www.fda.gov/medical-device-problems.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance) and CDRH Learn (https://www.fda.gov/training-and-continuing-education/cdrh-learn). 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 (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Christopher K. Dugard -S

for Clarence W. Murray, III, Ph.D.
Assistant Director
DHT4B: Division of Infection Control
and Plastic Surgery Devices
OHT4: Office of Surgical
and Infection Control Devices
Office of Product Evaluation and Quality
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: 06/30/2023 See PRA Statement below.

maications it

510(k) Number (if known)

K231501

Device Name

PRO-LITE Sterilization Trays

Indications for Use (Describe)

The PRO-LITE Sterilization Trays are used to contain medical devices for sterilization in the following Cycles:

- Lumen, Non Lumen, Flexible, Fast Non Lumen, Fast, and Specialty Cycles of the V-PRO Low Temperature Sterilization Systems
- Default Cycle of the STERRAD®* 100S Sterilizer
- Standard and Advanced Cycles of the STERRAD NX and NX with ALLClear Technology Sterilizers
- Standard, Flex Scope, Express and DUO Cycles of the STERRAD 100NX and 100NX with ALLClear Technology Sterilizers
- *STERRAD and ALLClear are trademarks of Advanced Sterilization Products

Prior to placing in the Sterilizer, the trays must either be:

- wrapped with a legally marketed sterilization wrap for use in the Sterilizers listed above or
- placed inside a legally marketed pouch for enclosing trays in the Sterilizers listed above

The PRO-LITE Sterilization Trays are not intended to maintain sterility; they are intended to be used in conjunction with a validated, FDA-cleared sterilization wrap or pouch in order to maintain sterility of the enclosed medical instruments.

Intended Sterilization Cycles and Intended Tray Loads for Tray Models: VP0045, VP0046, VP0047, VP0048, VP0049, VP0050, VP0051, VP0052

V-PRO 60 and s2 Lumen Cycle:

- Non-lumened devices with diffusion-restricted spaces such as the hinged portion of forceps and scissors
- Non-lumened devices including non-lumened rigid and semi-rigid endoscopes
- Medical devices, including single, dual and triple channeled rigid and semi-rigid endoscopes with the following configurations:
 - Single or dual channeled devices with stainless steel lumens that are:
 - \geq 0.77 mm ID and \leq 410 mm in length
 - \geq 1.8 mm ID x \leq 542 mm in length
 - Triple channeled devices with stainless steel lumens that are either:
 - \geq 1.2 mm ID and \leq 275 mm in length
 - \geq 1.8 mm ID and \leq 310 mm in length
 - \geq 2.8 mm ID and \leq 317 mm in length

V-PRO 60 and s2 Non Lumen Cycle:

Non-lumened devices including non-lumened rigid, semi-rigid and flexible endoscopes and non-lumened devices with diffusion-restricted spaces such as the hinged portion of forceps and scissors.

V-PRO 60 and s2 Flexible Cycle:

Load 1: One flexible surgical endoscope or bronchoscope with a light cord (if not integral to endoscope) and mat without any additional load. The flexible endoscope may be a:

• Single or dual lumen device with lumens that are ≥ 1 mm ID and ≤ 990 mm in length

Load 2: Non-lumened devices including non-lumened rigid, semi-rigid, and flexible endoscopes and non-lumened devices with diffusion-restricted areas such as the hinged portion of forceps or scissors. Medical devices, including rigid and semi-rigid endoscopes with the following configurations:

- \geq 0.76 mm ID and \leq 233 mm in length
- \geq 1.0 mm ID and \leq 254 mm in length
- \geq 1.8 mm ID and \leq 542 mm in length

Intended Sterilization Cycles and Intended Tray Loads for Tray Models: VP0045, VP0046, VP0047, VP0048, VP0049

V-PRO s2 Fast Cycle:

- Non-lumened devices including non-lumened rigid, semi-rigid and flexible endoscopes, and non-lumened devices with diffusion-restricted areas such as the hinged portion of forceps and scissors.
- Medical devices, including single, dual and triple channeled rigid and semi-rigid endoscopes, with the following configurations:
 - · Single or dual channeled devices with stainless steel lumens
 - \geq 0.77 mm ID and \leq 410 mm in length
 - \geq 1.8 mm ID and \leq 542 mm in length
 - Triple channeled devices with stainless steel lumens
 - \geq 1.2 mm ID and \leq 275 mm in length
 - \geq 1.8 mm ID and \leq 310 mm in length
 - \geq 2.8 mm ID and \leq 317 mm in length

Intended Sterilization Cycles and Intended Tray Loads for Tray Models: VP0045, VP0046, VP0047, VP0048, VP0049, VP0050, VP0051, VP0052, VP0053

V-PRO 1, 1 Plus, maX, and maX 2 Lumen Cycle:

- Non-lumened instruments with diffusion-restricted spaces such as the hinged portion of forceps and scissors
- Medical devices, including single, dual or triple channeled stainless steel lumens that are:
 - \geq 0.77 mm ID and \leq 527 mm in length
 - \geq 0.8 mm ID and \leq 542 mm in length
 - \geq 0.48 mm ID and \leq 100 mm in length
- Medical devices with dead end stainless steel lumens that are ≥ 1.3 mm ID and ≤ 73 mm in length
- Instruments with rigid non-metallic lumens (such as those used in endoscope sheaths, take-apart forceps and trocars) that are:
 - \geq 3 mm ID and \leq 298 mm in length
 - \geq 4 mm ID and \leq 424 mm in length

V-PRO 1 Plus, maX, and maX 2 Non Lumen Cycle:

Non-lumened devices including non-lumened rigid, semi-rigid and flexible endoscopes and non-lumened devices with diffusion-restricted spaces such as the hinged portion of forceps and scissors

V-PRO maX, and maX 2 Flexible Cycle:

Load 1: Single or dual lumen surgical flexible endoscopes (such as those used in ENT, Urology and Surgical Care) and bronchoscopes with a light cord (if not integral to endoscope) and mat with no additional load. The flexible endoscopes may contain either a single or dual lumen that is ≥ 1 mm ID and ≤ 1050 mm in length Load 2:

- Non-lumened devices including non-lumened rigid, semi-rigid and flexible endoscopes and non-lumened devices with diffusion-restricted spaces such as the hinged portion of forceps and scissors
- Single, dual or triple channel stainless steel lumens that are ≥ 0.48 mm ID and ≤ 100 mm in length

Intended Sterilization Cycles and Intended Tray Loads for Tray Models: VP0045, VP0046, VP0047, VP0048, VP0049, VP0050

V-PRO maX 2 Fast Non Lumen Cycle:

Non-lumened devices including non-lumened rigid, semi-rigid and flexible endoscopes and non-lumened devices with diffusion-restricted spaces such as the hinged portion of forceps and scissors.

V-PRO maX 2 Specialty Cycle:

Patient-specific surgical guides (eg. osteotomy, shoulder, hip, knee, spine) or anatomical models fabricated via additive manufacturing (3D printing) processes and intended for single-use during operative procedures.*

Non-lumened instruments including non-lumened general medical instruments, non-lumened rigid, semi-rigid and flexible endoscopes.**

- *The validation studies were conducted using a validation load consisting of pouched guide(s)/model(s) (with or without tray) for a total weight of 5 lbs (2.3 kg) 3D printed material.
- **The validation studies were conducted using a validation load consisting of one pouched intrument try or one pouch with guide(s)/model(s) (with or without tray) for a total weight of 11 lbs (5kg).

Material Surgical Guide Resin Biomed Amber Resin Dental LT Clear V2 Resin Biomed Clear Resin Biocompatible Clear MED610 Biocompatible Opaque Med615RGD Veroglaze MED620	Manufacturer Formlabs Formlabs Formlabs Stratasys Stratasys Stratasys	Specialty Cycle F F D D E E E	Lumens $\geq 3 \text{ mm ID and} \leq 30 \text{ mm L}$ $\geq 3 \text{ mm ID and} \leq 30 \text{ mm L}$ $\geq 3 \text{ mm ID and} \leq 30 \text{ mm L}$ $\geq 3 \text{ mm ID and} \leq 30 \text{ mm L}$ $\geq 3 \text{ mm ID and} \leq 20 \text{ mm L}$ $\geq 3 \text{ mm ID and} \leq 20 \text{ mm L}$ $\geq 3 \text{ mm ID and} \leq 20 \text{ mm L}$ $\geq 3 \text{ mm ID and} \leq 20 \text{ mm L}$
---	---	-------------------------------	--

Intended Sterilization Cycles and Intended Tray Loads for Tray Models: VP0045, VP0046, VP0047, VP0048, VP0049, VP0050, VP0051, VP0052

STERRAD 100S Default Cycle:

Metal and nonmetal medical devices including instruments which have diffusion-restricted spaces, such as the hinged portion of forceps and scissors.

Metal and nonmetal lumened instruments with

• > 6 mm ID and \leq 310 mm in length

Medical devices with a single stainless steel lumen with:

- > 1 mm ID and < 125 mm in length
- > 2 mm ID and \leq 250 mm in length
- \geq 3 mm ID and \leq 400 mm in length

Intended Sterilization Cycles and Intended Tray Loads for Tray Models: VP0045, VP0046, VP0048, VP0049

STERRAD NX and NX with ALLClear Technology Standard Cycle:

Metal and nonmetal medical devices including instruments which have diffusion-restricted spaces, such as the hinged portion of forceps and scissors.

Medical devices with a single stainless steel lumen with:

- \geq 1 mm ID and \leq 150 mm in length
- \geq 2 mm ID and \leq 400 mm in length

STERRAD NX and NX with ALLClear Technology Advanced Cycle:

Metal and non-metal medical devices including instruments which have diffusion-restricted spaces, such as the hinged portion of forceps and scissors

Medical devices with:

• a single stainless steel lumen with:

- \geq 1 mm ID and \leq 500 mm in length
- single channel polyethylene and Teflon (polytetrafluoroethylene)
 - \geq 1mm ID and \leq 850 mm in length

Intended Sterilization Cycles and Intended Tray Loads for Tray Models: VP0045, VP0046, VP0047, VP0048, VP0049, VP0051, VP0052, VP0053

STERRAD 100NX and 100NX with ALLClear Technology Standard Cycle:

Metal and nonmetal medical devices including instruments with have diffusion-restricted spaces, such as the hinged portion of forceps and scissors.

Medical devices with a single stainless steel lumen with:

• \geq 0.7 mm ID and \leq 500 mm in length

STERRAD 100NX and 100NX with ALLClear Technology Flex Scope Cycle:

Metal and nonmetal medical devices including instruments which have diffusion-restricted spaces, such as the hinged portion of forceps and scissors.

Medical devices, including most flexible endoscopes, with:

- Single channel polyethylene and Teflon (polytetrafluoroethylene)
 - \geq 1mm ID and \leq 850 mm in length

STERRAD 100NX and 100NX with ALLClear Technology Express Cycle:

Metal and nonmetal devices surfaces and instruments which have diffusion-restricted spaces, such as the hinged portion of forceps and scissors.

STERRAD 100NX and 100NX with ALLClear Technology Duo Cycle:

Medical devices including:

- most flexible endoscopes with a single channel of polyethylene and Teflon (polytetrafluoroethylene) with ≥ 1 mm ID and < 875 mm in length
- · accessory devices that are normally connected to a flexible endoscope during use
- · flexible endoscopes without lumens

Instrument organizers are optional accessories intended to stabilize cylindrical medical instruments within the Sterilization Trays.

Model	Description
VP0054	Blank, Tall
VP0055	Blank, Short
VP0063	3 mm - 7 mm, Tall
VP0064	7 mm – 11 mm, Tall
VP0065	11 mm – 15 mm, Tall
VP0066	15 mm – 19 mm, Tall
VP0067	3 mm - 7 mm, Short
VP0068	7 mm - 11 mm, Short
VP0069	11 mm – 15 mm, Short
VP0070	15 mm – 19 mm, Short

Sterilization mats are optional accessories intended to cushion and stabilize instruments within the Sterilization Trays.

Model VP0071 VP0072 VP0073	Description (to fit Length" x Width" Tray) 13 x 4.5 19 x 4.5 25 x 4.5
	25 x 4.5 13 x 7.75
VP0074 VP0075	13 x 7.75 19 x 7.75
VP0075 VP0076	27 x 7.75

CONTINUE ON A SEPARATE PAGE IF NEEDED.				
Prescription	Use (Part 21 CFR 801 Subpart D)	Over-The-Counter Use (21 CFR 801 Subpart C)		
pe of Use (Select one or bot	h, as applicable)			
VP0079	25 x 14			
VP0078	25 x 11.75			
VP0077	12 x 11.75			

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.

The burden time for this collection of information is estimated to average 79 hours per response, including the time to review instructions, search existing data sources, gather and maintain the data needed and complete and review the collection of information. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, to:

Department of Health and Human Services Food and Drug Administration Office of Chief Information Officer Paperwork Reduction Act (PRA) Staff PRAStaff@fda.hhs.gov

"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."



510(k) Summary For K231501 PRO-LITETM Sterilization Tray

Sponsor Facility

STERIS Corporation 5960 Heisley Road Mentor, OH 44060 Phone: (440) 354-2600

Fax No: (440) 357-9198

Contact: Jennifer Nalepka

Manager, Regulatory Affairs

Telephone: (440) 392-7458

e-mail: jennifer nalepka@steris.com

Submission Date: August 3, 2023

STERIS Corporation ■ 5960 Heisley Road ■ Mentor, OH 44060-1834 USA ■ 440-354-2600

1. Device Name

Trade Name: PRO-LITE Sterilization Tray

Common/usual Name: Sterilization Trays, cassettes and other accessories

Classification Name: Sterilization Wrap
Classification 21 CFR 880.6850

Class II

Product Code KCT

2. Predicate Device

PRO-LITE Sterilization Tray, K222440

3. <u>Description of Device</u>

The PRO-LITE Sterilization Trays contain medical devices for sterilization in the V-PRO Low Temperature Sterilization Systems:

- V-PRO 1 Low Temperature Sterilization System,
- V-PRO 1 Plus Low Temperature Sterilization System,
- V-PRO maX Low Temperature Sterilization System,
- V-PRO maX 2 Low Temperature Sterilization System
- V-PRO 60 Low Temperature Sterilization System and
- V-PRO s2 Low Temperature Sterilization System

and the following STERRAD Sterilizers and cycles:

- STERRAD 100S Sterilizer Default Cycle
- STERRAD NX with and without ALLClear Technology Sterilizer Standard and Advanced Cycles
- STERRAD 100NX with and without ALLClear Technology Sterilizer Standard, Flex Scope, Express and Duo Cycles

The trays are available in various sizes, outlined in **Table 5-1**, to accommodate the loads to be processed. The proposed trays are identical in design to the predicate Sterilization Tray (K222440) and are composed of a base and a lid. The lid includes clamping mechanisms designed to secure the lid onto the base. There are numerous holes in the base and lid for sterilant penetration. The tray is categorized as a cassette and requires complete enclosure in a legally-marketed sterilization wrap or pouch to maintain sterility of the enclosed devices. Both the base and the lid for the proposed tray are made of a mineral-filled polypropylene material.

Table 5-1. External Dimensions of Tray Line

Model	Description (in)	Model	Description (in)
VP0045	13 x 4.5 x 2.25	VP0050	27 x 7.75 x 4
VP0046	19 x 4.5 x 2.25	VP0051	12 x 11.75 x 4
VP0047	25 x 4.5 x 2.25	VP0052	25 x 11.75 x 4
VP0048	13 x 7.75 x 2.25	VP0053	25 x 14 x 5
VP0049	19 x 7.75 x 2.25		

Optional instrument organizers are provided as accessories to the trays and allow stabilization of various cylindrical medical devices during processing. **Table 5-2** lists the organizer sizes. The organizers are either "blank" and are used to partition the tray or have a device holding portion into which the devices are inserted. At the organizer base is a flapped groove that is used to position the organizer within a PRO-LITE Sterilization Tray.

Table 5.2. Instrument Organizer Model Numbers

Model	Description	Model	Description
VP0054	Blank, Tall	VP0055	Blank, Short
VP0063	3 mm - 7mm, Tall	VP0067	3 mm - 7 mm, Short
VP0064	7 mm - 11mm, Tall	VP0068	7 mm -11 mm, Short
VP0065	11 mm - 15 mm, Tall	VP0069	11 mm - 15 mm, Short
VP0066	15 mm - 19mm, Tall	VP0070	15 mm – 19 mm, Short

Optional sterilization mats are provided as accessories to the trays. The mats, which are used to cushion and stabilize devices placed into the trays, are available in sizes as shown in **Table 5-3** to fit the nine PRO-LITE Sterilization Trays. The mats are a diamond grid design with "fingers" that extend from each corner of the diamond and at the midpoint of each diamond side. The fingers cushion and stabilize instruments, helping to prevent the instruments from freely moving in the tray during packaging, sterilization and storage. The cushioning and stabilization qualities help protect delicate instruments placed into the trays.

Table 5-3. Silicone Mat Model Numbers

Model	Description (in)	Model	Description (in)
VP0071	13 x 4.5	VP0076	27 x 7.75
VP0072	19 x 4.5	VP0077	12 x 11.75
VP0073	25 x 4.5	VP0078	25 x 11.75
VP0074	13 x 7.75	VP0079	25 x 14
VP0075	19 x 7 75		

The purpose of this submission is to add or expand claims for the use of these tray models in the following sterilizer cycles V-PRO maX 2 Specialty Cycle. No changes have been made to the device for this claim other than labeling.

4. Intended Use/ Indications for Use

The PRO-LITETM Sterilization Trays are used to contain medical devices for sterilization in the following Cycles:

- Lumen, Non Lumen, Flexible, Fast Non Lumen, Fast and Specialty Cycles of the V-PRO® Low Temperature Sterilization Systems
- Default Cycle of the STERRAD®* 100S Sterilizer
- Standard and Advanced Cycles of the STERRAD NX and NX with ALLClear Technology Sterilizers
- Express, Standard, Flex Scope, and DUO Cycles of the STERRAD 100NX and 100 NX with ALLClear Technology Sterilizers

Prior to placing in the Sterilizer, the trays must either be:

- wrapped with a legally marketed sterilization wrap for use in the Sterilizers listed above.
- placed inside a legally marketed pouch for enclosing trays in the Sterilizers listed above.

The PRO-LITE Sterilization Trays are not intended to maintain sterility; they are intended to be used in conjunction with a validated, FDA-cleared sterilization wrap or pouch in order to maintain sterility of the enclosed medical instruments.

Tray Models	Intended Sterilization Cycles	Intended Tray Load		
VP0045 VP0046 VP0047 VP0048 VP0049 VP0050 VP0051 VP0052	V-PRO 60 and s2 Lumen Cycle	 Non-lumened devices with diffusion-restricted spaces such as the hinged portion of forceps and scissors Non-lumened devices including non-lumened rigid and semi-rigid endoscopes Medical devices, including single, dual and triple channeled rigid and semi-rigid endoscopes with the following configurations: Single or dual lumen devices with stainless steel lumens that are:		
	V-PRO 60 and s2 Non Lumen Cycle	Non-lumened devices including non-lumened rigid, semi-rigid and flexible endoscopes and non-lumened devices with		

^{*}STERRAD and ALLClear are trademarks of Advanced Sterilization Products

Tray Models	Intended Sterilization Cycles	Intended Tray Load
	·	diffusion-restricted spaces such as the hinged portion of forceps and scissors.
	V-PRO 60 and s2 Flexible Cycle	 Load 1: One flexible surgical endoscope or bronchoscope with a light cord (if not integral to endoscope) and mat without any additional load. The flexible endoscope may be a: Single or dual lumen device with lumens that are ≥ 1 mm ID and ≤ 990 mm in length Load 2: Non-lumened devices including non-lumened rigid, semi-rigid, and flexible endoscopes and non-lumened devices with diffusion-restricted areas such as the hinged portion of forceps or scissors. Medical devices, including rigid and semi-rigid endoscopes with the following configurations:
VP0045 VP0046 VP0047 VP0048 VP0049	V-PRO s2 Fast Cycle	 Non-lumened devices including non-lumened rigid, semirigid and flexible endoscopes, and non-lumened devices with diffusion restricted areas such as the hinged portion of forceps or scissors. Medical devices, including single, dual and triple channeled rigid and semi-rigid endoscopes, with the following configurations: Single or dual lumen channeled devices with stainless steel lumens ≥ 0.77 mm ID and ≤ 410 mm in length ≥ 1.8 mm ID and ≤ 542 mm in length Triple lumen devices ≥ 1.2 mm ID and ≤ 310 mm in length ≥ 1.8 mm ID and ≤ 310 mm in length ≥ 2.8 mm ID and ≤ 317 mm in length ⇒ 2.8 mm ID and ≤ 317 mm in length ⇒ 2.8 mm ID and ≤ 317 mm in length ⇒ 2.8 mm ID and ≤ 317 mm in length ⇒ 2.8 mm ID and ≤ 317 mm in length ⇒ 2.8 mm ID and ≤ 317 mm in length → → 1.8 mm ID and ≤ 317 mm in length → → 1.8 mm ID and ≤ 317 mm in length → → 1.8 mm ID and ≤ 317 mm in length → → 1.8 mm ID and ≤ 317 mm in length → → 1.8 mm ID and ≤ 317 mm in length → → 1.8 mm ID and ≤ 317 mm in length → → 1.8 mm ID and ≤ 317 mm in length → → 1.8 mm ID and ≤ 317 mm in length → → 1.8 mm ID and ≤ 317 mm in length → → 1.8 mm ID and ≤ 317 mm in length → → 1.8 mm ID and ≤ 317 mm in length → → 1.8 mm ID and ≤ 317 mm in length → → 1.8 mm ID and ≤ 317 mm in length → → 1.8 mm ID and ≤ 317 mm in length → → 1.8 mm ID and ≤
VP0045 VP0046 VP0047 VP0048 VP0050 VP0051 VP0052 VP0053	V-PRO 1, 1 Plus, maX, and maX 2 Lumen Cycle	 Non-lumened instruments with diffusion-restricted spaces such as the hinged portion of forceps and scissors Medical devices, including single, dual or triple channeled stainless steel lumens that are: ≥ 0.77 mm ID and ≤ 527 mm in length ≥ 0.8 mm ID and ≤ 542 mm in length ≥ 0.48 mm ID and ≤ 100 mm in length Medical devices with dead end stainless steel lumens that are ≥ 1.3 mm ID and ≤ 73 mm in length Instruments with rigid non-metallic lumens (such as those used in endoscope sheaths, take-apart forceps and trocars) that are: ≥ 3 mm ID and ≤ 298 mm in length ≥ 4 mm ID and ≤ 424 mm in length
	V-PRO 1 Plus, maX, and maX	Non-lumened devices including non-lumened rigid, semi-rigid and flexible endoscopes and non-lumened devices with

Tray Models	Intended Sterilization Cycles	Intended Tray Load			
	2 Non Lumen	diffusion-restricted spaces such as the hinged portion of force			d portion of forceps
	V-PRO maX, and maX 2	(such as those us bronchoscopes v and mat with no	additional load. single or dual lur	ogy and Su (if not integ The flexibl	
	Flexible Cycle	rigid and fle with diffusion of forceps and Single, dual	xible endoscopes on-restricted spac nd scissors	s and non-luces such as to	nened rigid, semi- amened devices the hinged portion $\cos t$ that are ≥ 0.48
	V-PRO maX 2 Fast Non Lumen Cycle	Non-lumened devices including non-lumened rigid, semi-rigid and flexible endoscopes and non-lumened devices with diffusion-restricted spaces such as the hinged portion of forceps and scissors.			
VP0045 VP0046 VP0047 VP0048 VP0049 VP0050	V-PRO maX 2 Specialty Cycle	Patient-specific surgical guides (e.g. osteotomy, shoulder, hip, knee, spine) or anatomical models fabricated via additive manufacturing (3D printing) processes and intended for single-use during operative procedures.* or Non-lumened instruments including non-lumened general medical instruments, non-lumened rigid, semi-rigid and flexible endoscopes.** * The validation studies were conducted using a validation load consisting of pouched guide(s)/model(s) (with or without tray) for a total weight of 5 lbs (2.3kg) 3D printed material. **The validation studies were conducted using a validation load consisting of one pouched instrument tray or one pouch with guide(s)/model(s) (with or without tray) for a total weight of 11 lbs (5kg).			
		Material	Manufacturer	Specialty Cycle	Lumens
		Surgical Guide Resin BioMed	Formlabs Formlabs	F F	≥3 mm ID x ≤30 mm L ≥3 mm ID x ≤30
		Amber Resin Dental LT Clear V2 Resin	Formlabs	D	mm L ≥3 mm ID x ≤30 mm L
		BioMed Clear Resin	Formlabs	D	≥3 mm ID x ≤30 mm L

Tray Models	Intended Sterilization Cycles	Intended Tray Load			
		Biocompatible Clear MED610	Stratasys	Е	≥3 mm ID x ≤20 mm L
		Biocompatible Opaque MED615RGD	Stratasys	Е	≥3 mm ID x ≤20 mm L
		VeroGlaze™ MED620	Stratasys	Е	≥3 mm ID x ≤20 mm L
VP0045 VP0046 VP0047 VP0048 VP0049 VP0050 VP0051 VP0052	STERRAD 100S Default Cycle	Metal and nonmetal medical devices including instruments which have diffusion-restricted spaces, such as the hinged portion of forceps and scissors. Metal and nonmetal lumened instruments with • ≥ 6 mm ID and ≤ 310 mm in length Medical devices with a single stainless steel lumen with: • ≥ 1 mm ID and ≤ 125 mm in length • ≥ 2 mm ID and ≤ 250 mm in length • ≥ 3 mm ID and ≤ 400 mm in length Metal and non-metal medical devices including instruments			
VD0045	STERRAD NX and NX with ALLClear Technology Standard Cycle	which have diffu portion of forcep Medical devices • ≥ 1 mm	sion-restricted sp	paces, such inless steel n in length	as the hinged
VP0045 VP0046 VP0048 VP0049	STERRAND NX and NX with ALLClear Technology Advanced Cycle	which have diffue portion of forcer Medical devices o a single o single cl (polyteti	netal medical devision-restricted spots and scissors, including most stainless steel lumm ID and ≤ 500 nannel polyethylorafluoroethylene) nm ID and ≤ 850	paces, such flexible end men with: 0 mm in ler ene and Tet	as the hinged doscopes, with:
VP0045 VP0046	STERRAD 100NX and 100NX with ALLClear Technology Standard Cycle	Metal and nonm have diffusion-re forceps and sciss Medical devices	etal medical devi- estricted spaces, sors with a single sta m ID and ≤ 500 r	ices includi such as the inless steel nm in lengt	ng instruments with hinged portion of lumen with:
VP0047 VP0048 VP0049 VP0051 VP0052 VP0053 STERRAD 100NX and 100NX with ALLClear Technology Flex Scope Cycle	which have diffu portion of forcer Medical devices • Single c (polytetr	, including most hannel polyethyl rafluoroethylene) $\geq 1 \text{ mm ID}$ and \leq	paces, such flexible end ene and Te 850 mm in	as the hinged doscopes, with: flon length	
	STERRAD 100NX and 100NX with		_		struments which hinged portion of

Tray Models	Intended Sterilization Cycles	Intended Tray Load
	ALLClear Technology Express Cycle	
	STERRAD 100NX and 100NX with ALLClear Technology Duo Cycle	 Medical devices including: most flexible endoscopes with a single channel of polyethylene and Teflon (polytetrafluoroethylene) with ≥ 1 mm ID and ≤ 875 mm in length accessory devices that are normally connected to a flexible endoscope during use flexible endoscopes without lumens

Instrument organizers are optional accessories intended to stabilize cylindrical medical instruments within the PRO-LITE Sterilization Trays.

Model	Description	Model	Description
VP0054	Blank, Tall	VP0055	Blank, Short
VP0063	3 mm - 7 mm, Tall	VP0067	3 mm - 7 mm, Short
VP0064	7 mm - 11 mm, Tall	VP0068	7 mm - 11 mm, Short
VP0065	11 mm - 15 mm, Tall	VP0069	11 mm - 15 mm, Short
VP0066	15 mm - 19 mm, Tall	VP0070	15 mm - 19 mm, Short

Sterilization mats are optional accessories intended to cushion and stabilize instruments within the PRO-LITE Sterilization Trays.

Model	Description (in)	Model	Description (in)	Model	Description (in)
VP0071	13 x 4.5	VP0074	13 x 7.75	VP0077	12 x 11.75
VP0072	19 x 4.5	VP0075	19 x 7.75	VP0078	25 x 11.75
VP0073	25 x 4.5	VP0076	27 x 7.75	VP0079	25 x 14

5. Summary of Technical Characteristics

The proposed PRO-LITE sterilization trays, sterilization mats and instrument organizers are identical in composition to the claimed predicate devices. The technical characteristics are summarized below in **Table 5-5**.

Table 5-5. Summary of Tray Physical Description and Technological Properties

Eastuna	PRO-LITE Sterilization Tray	PRO-LITE Sterilization Tray	Comparison
Feature	(proposed / K231501)	(predicate / K222440)	_
Feature	 (proposed / K231501) The PRO-LITE Sterilization Trays are used to contain medical devices for sterilization in the following Cycles: Lumen, Non Lumen, Flexible, Fast Non Lumen, Fast and Specialty Cycles of the V-PRO Low Temperature Sterilization Systems Default Cycle of the STERRAD^{®*} 100S Sterilizer Standard and Advanced Cycles of the STERRAD NX and NX with ALLClear Technology Sterilizers Standard, Flex Scope, Express and DUO Cycles of the STERRAD 100NX and 100NX with ALLClear Technology 	· ·	Additional claims have been added for the V-PRO maX 2 Specialty Cycle – all other indications for use are the same
Intended Use / Indications for Use	*STERRAD and ALLClear are trademarks of Advanced Sterilization Products Prior to placing in the Sterilizer, the trays must either be: • wrapped with a legally marketed sterilization wrap for use in the Sterilizers listed above or • placed inside a legally marketed pouch for enclosing trays in the Sterilizers listed above.	*STERRAD and ALLClear are trademarks of Advanced Sterilization Products Prior to placing in the Sterilizer, the trays must either be: • wrapped with a legally marketed sterilization wrap for use in the Sterilizers listed above or • placed inside a legally marketed pouch for enclosing trays in the Sterilizers listed above.	
	The PRO-LITE Sterilization Trays are not intended to maintain sterility; they are intended to be used in conjunction with a validated, FDA-cleared sterilization wrap or pouch in order to maintain sterility of the enclosed medical instruments. Intended Sterilization Cycles and Intended Tray Loads for Tray Models: VP0045, VP0046, VP0047, VP0048, VP0049, VP0050, VP0051, VP0052 V-PRO 60 and s2 Lumen Cycle:	The PRO-LITE Sterilization Trays are not intended to maintain sterility; they are intended to be used in conjunction with a validated, FDA-cleared sterilization wrap or pouch in order to maintain sterility of the enclosed medical instruments. Intended Sterilization Cycles and Intended Tray Load for Tray Models: VP0045, VP0046, VP0047, VP0048, VP0049, VP0050, VP0051, VP0052 V-PRO 60 and s2 Lumen Cycle:	
	Non-lumened devices with diffusion- restricted spaces such as the hinged portion of forceps and scissors	Non-lumened devices with diffusion- restricted spaces such as the hinged portion of forceps and scissors	

Feature	PRO-LITE Sterilization Tray (proposed / K231501)	PRO-LITE Sterilization Tray (predicate / K222440)	Comparison
	 Non-lumened devices including non-lumened rigid and semi-rigid endoscopes Medical devices, including single, dual and triple channeled rigid and semi-rigid endoscopes with the following configurations: Single or dual channeled devices with stainless steel lumens that are:	 Non-lumened devices including non-lumened rigid and semi-rigid endoscopes Medical devices, including single, dual and triple channeled rigid and semi-rigid endoscopes with the following configurations: Single or dual channeled devices with stainless steel lumens that are:	
	■ ≥ 2.8 mm ID and ≤ 317 mm in length V-PRO 60 and s2 Non Lumen Cycle: Non-lumened devices including non- lumened rigid, semi-rigid and flexible endoscopes and non-lumened devices with diffusion-restricted spaces such as the hinged portion of forceps and scissors.	■ ≥ 2.8 mm ID and ≤ 317 mm in length V-PRO 60 and s2 Non Lumen Cycle: Non-lumened devices including non- lumened rigid, semi-rigid and flexible endoscopes and non-lumened devices with diffusion-restricted spaces such as the hinged portion of forceps and scissors.	
	 V-PRO 60 and s2 Flexible Cycle: Load 1: One flexible surgical endoscope or bronchoscope with a light cord (if not integral to endoscope) and mat without any additional load. The flexible endoscope may be a: Single or dual lumen device with lumens that are ≥ 1 mm ID and ≤ 990 mm in length Load 2: Non-lumened devices including non-lumened rigid, semi-rigid, and flexible endoscopes and non-lumened devices with diffusion-restricted areas such as the hinged portion of forceps or scissors. Medical devices, including rigid and semi-rigid endoscopes with the following configurations: ≥ 0.76 mm ID and ≤ 233 mm in length 	 V-PRO 60 and s2 Flexible Cycle: Load 1: One flexible surgical endoscope or bronchoscope with a light cord (if not integral to endoscope) and mat without any additional load. The flexible endoscope may be a: Single or dual lumen device with lumens that are ≥ 1 mm ID and ≤ 990 mm in length Load 2: Non-lumened devices including non-lumened rigid, semi-rigid, and flexible endoscopes and non-lumened devices with diffusion-restricted areas such as the hinged portion of forceps or scissors. Medical devices, including rigid and semi-rigid endoscopes with the following configurations: ≥ 0.76 mm ID and ≤ 233 mm in length 	
	 ≥ 1.0 mm ID and ≤ 254 mm in length ≥ 1.8 mm ID and ≤ 542 mm in length Intended Sterilization Cycles and Intended Tray Loads for Tray Models: VP0045, VP0046, VP0047, VP0048, VP0049 	 ≥ 1.0 mm ID and ≤ 254 mm in length ≥ 1.8 mm ID and ≤ 542 mm in length Intended Sterilization Cycle and Intended Tray Load for Tray Models: VP0045, VP0046, VP0047, VP0048, VP0049 	

Eagton	PRO-LITE Sterilization Tray	PRO-LITE Sterilization Tray	Comparison
Feature	(proposed / K231501)	(predicate / K222440)	
	V-PRO s2 Fast Cycle:	V-PRO s2 Fast Cycle:	
	Non-lumened devices including non-	 Non-lumened devices including non- 	
	lumened rigid, semi-rigid and flexible	lumened rigid, semi-rigid and flexible	
	endoscopes, and non-lumened devices with	endoscopes, and non-lumened devices with	
	diffusion-restricted areas such as the	diffusion-restricted areas such as the	
	hinged portion of forceps and scissors.	hinged portion of forceps and scissors.	
	• Medical devices, including single, dual and	 Medical devices (including single, dual 	
	triple channeled rigid and semi-rigid	and triple channeled rigid and semi-rigid	
	endoscopes, with the following	endoscopes) with the following	
	configurations:	configurations:	
	 Single or dual channeled devices with 	 Single or dual channeled devices with 	
	stainless steel lumens	stainless steel lumens	
	■ \geq 0.77 mm ID and \leq 410 mm in length	■ \geq 0.77 mm ID and \leq 410 mm in length	
	■ \geq 1.8 mm ID and \leq 542 mm in length	■ \geq 1.8 mm ID and \leq 542 mm in length	
	 Triple channeled devices with stainless 	 Triple channeled devices with stainless 	
	steel lumens	steel lumens that are either	
	■ \geq 1.2 mm ID and \leq 275 mm in length	■ \geq 1.2 mm ID and \leq 275 mm in length	
	■ \geq 1.8 mm ID and \leq 310 mm in length	■ \geq 1.8 mm ID and \leq 310 mm in length	
	■ \geq 2.8 mm ID and \leq 317 mm in length	■ \geq 2.8 mm ID and \leq 317 mm in length	
	Intended Sterilization Cycles and Intended	Intended Sterilization Cycles and Intended	
	Tray Loads for Tray Models: VP0045,	Tray Load for Tray Models: VP0045,	
	VP0046, VP0047, VP0048, VP0049,	VP0046, VP0047, VP0048, VP0049,	
	VP0050, VP0051, VP0052, VP0053	VP0050, VP0051, VP0052, VP0053	
		. 1 000 0, 1 000 1, 1 000 <u>2</u> , 1 000 0	
	V-PRO 1, 1 Plus, maX, and maX 2 Lumen	V-PRO 1, 1 Plus, maX, and maX 2 Lumen	
	Cycle:	Cycle:	
	• Non-lumened instruments with diffusion-	 Non-lumened devices with diffusion- 	
	restricted spaces such as the hinged portion	restricted spaces such as the hinged portion	
	of forceps and scissors	of forceps and scissors	
	• Medical devices, including single, dual or	 Medical devices, including single, dual or 	
	triple channeled stainless steel lumens that	triple channeled stainless steel lumens that	
	are:	are:	
	$\circ \ge 0.77 \text{ mm ID and} \le 527 \text{ mm in length}$	$\circ \ge 0.77 \text{ mm ID and} \le 527 \text{ mm in length}$	
	$\circ \ge 0.8 \text{ mm ID and } \le 542 \text{ mm in length}$	$\circ \ge 0.8 \text{ mm ID and } \le 542 \text{ mm in length}$	
	$\circ \ge 0.48 \text{ mm ID and} \le 100 \text{ mm in length}$	$\circ \ge 0.48 \text{ mm ID and} \le 100 \text{ mm in length}$	
	Medical devices with dead end stainless	Medical devices with dead end stainless	
	steel lumens that are ≥ 1.3 mm ID and ≤ 73	steel lumens that are $\geq 1.3 \text{ mm ID}$ and ≤ 73	
	mm in length	mm in length	
	• Instruments with rigid non-metallic lumens	• Devices with rigid non-metallic lumens	
	(such as those used in endoscope sheaths,	(such as those used in endoscope sheaths,	
	take-apart forceps and trocars) that are:	take-apart forceps and trocars) that are:	
	$0 \ge 3$ mm ID and ≤ 298 mm in length	$\circ \ge 3$ mm ID and ≤ 298 mm in length	
	$\circ \ge 4 \text{ mm ID and} \le 424 \text{ mm in length}$	$\circ \ge 4 \text{ mm ID and} \le 424 \text{ mm in length}$	
	V-PRO 1 Plus, maX, and maX 2 Non Lumen	V-PRO 1 Plus, maX, and maX 2 Non Lumen	
	Cycle:	Cycle:	
L	1 		

Feature	PRO-LITE Sterilization Tray (proposed / K231501)	PRO-LITE Sterilization Tray (predicate / K222440)	Comparison
	Non-lumened devices including non- lumened rigid, semi-rigid and flexible endoscopes and non-lumened devices with diffusion-restricted spaces such as the hinged portion of forceps and scissors	Non-lumened devices including non- lumened rigid, semi-rigid and flexible endoscopes and non-lumened devices with diffusion-restricted spaces such as the hinged portion of forceps and scissors	
	 V-PRO maX, and maX 2 Flexible Cycle: Load 1: Single or dual lumen surgical flexible endoscopes (such as those used in ENT, Urology and Surgical Care) and bronchoscopes with a light cord (if not integral to endoscope) and mat with no additional load. The flexible endoscopes may contain either a single or dual lumen that is ≥ 1 mm ID and ≤ 1050 mm in length Load 2: Non-lumened devices including non-lumened rigid, semi-rigid and flexible endoscopes and non-lumened devices with diffusion-restricted spaces such as the hinged portion of forceps and scissors Single, dual or triple channel stainless steel lumens that are ≥ 0.48 mm ID and ≤ 100 mm in length 	V-PRO maX, and maX 2 Flexible Cycle: Load 1: Single or dual lumen surgical flexible endoscopes (such as those used in ENT, Urology and Surgical Care) and bronchoscopes with a light cord (if not integral to endoscope) and mat with no additional load. The flexible endoscopes may contain either a single or dual lumen that is ≥ 1 mm ID and ≤ 1050 mm in length Load 2: Non-lumened devices including non- lumened rigid, semi-rigid and flexible endoscopes and non-lumened devices with diffusion-restricted spaces such as the hinged portion of forceps and scissors Single, dual or triple channel stainless steel lumens that are ≥ 0.48 mm ID and ≤ 100 mm in length	
	Intended Sterilization Cycles and Intended Tray Loads for Tray Models: VP0045, VP0046, VP0047, VP0048, VP0049, VP0050		
	V-PRO maX 2 Fast Non Lumen Cycle: Non-lumened devices including non-lumened rigid, semi-rigid and flexible endoscopes and non-lumened devices with diffusion-restricted spaces such as the hinged portion of forceps and scissors.	V-PRO maX 2 Fast Non Lumen Cycle: Non-lumened devices including non-lumened rigid, semi-rigid and flexible endoscopes and non-lumened devices with diffusion-restricted spaces such as the hinged portion of forceps and scissors.	
	V-PRO maX 2 Specialty Cycle: Patient-specific surgical guides (e.g. osteotomy, shoulder, hip, knee, spine) or anatomical models fabricated via additive manufacturing (3D printing) processes and intended for single-use during operative procedures.* or Non-lumened instruments including non-lumened general medical instruments, non-		

Feature	PRO-LITE Sterilization Tray (proposed / K231501)	PRO-LITE Sterilization Tray (predicate / K222440)	Comparison
	lumened rigid, semi-rigid and flexible endoscopes.**		
	* The validation studies were conducted using a validation load consisting of pouched guide(s)/model(s) (with or without tray) for a total weight of 5 lbs (2.3kg) 3D printed material. **The validation studies were conducted using a validation load consisting of one pouched instrument tray or one pouch with guide(s)/model(s) (with or without tray) for a total weight of 11 lbs (5kg).		
	 Formlabs Surgical Guide Resin, Specialty Cycle F, Lumens ≥ 3 mm ID x ≤ 30 mm L Formlabs BioMed Amber Resin, Specialty Cycle F, Lumens ≥ 3 mm ID x ≤ 30 mm L Formlabs Dental LT Clear V2 Resin, Specialty Cycle D, Lumens ≥ 3 mm ID x ≤ 30 mm L 		
	 Formlabs BioMed Clear Resin, Specialty Cycle D, Lumens ≥ 3 mm ID x ≤ 30 mm L Stratasys Biocompatible Clear MED610, Specialty Cycle E, Lumens ≥ 3 mm ID x ≤ 20 mm L 		
	• Stratasys Biocompatible Clear MED610, Specialty Cycle E, Lumens ≥ 3 mm ID x ≤ 20 mm L		
	• Stratasys Biocompatible Opaque MED615 RGD, Specialty Cycle E, Lumens ≥ 3 mm ID $x \leq 20$ mm L Stratasys VeroGlaze MED620, Specialty Cycle E, Lumens ≥ 3 mm ID $x \leq 20$ mm L		
	Intended Sterilization Cycles and Intended Tray Loads for Tray Models: VP0045, VP0046, VP0047, VP0048, VP0049, VP0050, VP0051, VP0052	Intended Sterilization Cycles and Intended Tray Load for Tray Models: VP0045, VP0046, VP0047, VP0048, VP0049, VP0050, VP0051, VP0052	
	STERRAD 100S Default Cycle: Metal and nonmetal medical devices including instruments which have diffusion-restricted spaces, such as the hinged portion of forceps and scissors. Metal and nonmetal lumened instruments with • ≥ 6 mm ID and ≤ 310 mm in length	STERRAD 100S Default Cycle: Metal and nonmetal medical devices including instruments which have diffusion- restricted spaces, such as the hinged portion of forceps and scissors. Metal and nonmetal lumened instruments with ◆ ≥ 6 mm ID and ≤ 310 mm in length	

Feature	PRO-LITE Sterilization Tray (proposed / K231501)	PRO-LITE Sterilization Tray (predicate / K222440)	Comparison
	Medical devices with a single stainless steel	Medical devices with a single stainless steel	
	lumen with:	lumen with:	
	• ≥ 1 mm ID and ≤ 125 mm in length	• ≥ 1 mm ID and ≤ 125 mm in length	
	• \geq 2 mm ID and \leq 250 mm in length	• \geq 2 mm ID and \leq 250 mm in length	
	• \geq 3 mm ID and \leq 400 mm in length	• \geq 3 mm ID and \leq 400 mm in length	
	Intended Sterilization Cycles and Intended Tray Loads for Tray Models: VP0045, VP0046, VP0048, VP0049	Intended Sterilization Cycles and Intended Tray Load for Tray Models: VP0045, VP0046, VP0048, VP0049	
	STERRAD NX and NX with ALLClear Technology Standard Cycle: Metal and non-metal medical devices including instruments which have diffusion- restricted spaces, such as the hinged portion of forceps and scissors. Medical devices with a single stainless steel	STERRAD NX and NX with ALLClear Technology Standard Cycle: Metal and non-metal medical devices including instruments which have diffusion- restricted spaces, such as the hinged portion of forceps and scissors. Medical devices with a single stainless steel	
	lumen with:	lumen with:	
	• \geq 1 mm ID and \leq 150 mm in length	• ≥ 1 mm ID and ≤ 150 mm in length	
	• \geq 2 mm ID and \leq 400 mm in length	• \geq 2 mm ID and \leq 400 mm in length	
	STERRAND NX and NX with ALLClear Technology Advanced Cycle: Metal and non-metal medical devices including instruments which have diffusion- restricted spaces, such as the hinged portion of forceps and scissors Medical devices, including most flexible endoscopes, with: ○ a single stainless steel lumen with: ○ ≥ 1 mm ID and ≤ 500 mm in length ○ single channel polyethylene and Teflon (polytetrafluoroethylene) ○ ≥ 1 mm ID and ≤ 850 mm in length	STERRAND NX and NX with ALLClear Technology Advanced Cycle: Metal and non-metal medical devices including instruments which have diffusion- restricted spaces, such as the hinged portion of forceps and scissors Medical devices, including most flexible endoscopes, with: ○ a single stainless steel lumen with: ○ ≥ 1 mm ID and ≤ 500 mm in length ○ single channel polyethylene and Teflon (polytetrafluoroethylene) ○ ≥ 1 mm ID and ≤ 850 mm in length	
	Intended Sterilization Cycles and Intended	Intended Sterilization Cycles and Intended	
	Tray Loads for Tray Models:	Tray Load for Tray Models: VP0045,	
	VP0045, VP0046, VP0047, VP0048,	VP0046, VP0048, VP0049, VP0051,	
	VP0049, VP0051, VP0052, VP0053	VP0052, VP0053	
	STERRAD 100NX and 100NX with ALLClear Technology Standard Cycle: Metal and nonmetal medical devices including instruments with have diffusion- restricted spaces, such as the hinged portion of forceps and scissors	STERRAD 100NX and 100NX with ALLClear Technology Standard Cycle: Metal and nonmetal medical devices including instruments with have diffusion- restricted spaces, such as the hinged portion of forceps and scissors	
	Medical devices with a single stainless steel	Medical devices with a single stainless steel	
	lumen with:	lumen with:	

Feature	PRO-LITE Sterilization Tray (proposed / K231501)	PRO-LITE Sterilization Tray (predicate / K222440)	Comparison
reature	• ≥ 0.7 mm ID and ≤ 500 mm in length STERRAD 100NX and 100NX with ALLClear Technology Flex Scope Cycle: Metal and nonmetal medical devices including instruments which have diffusion- restricted spaces, such as the hinged portion of forceps and scissors. Medical devices, including most flexible endoscopes, with: • Single channel polyethylene and Teflon (polytetrafluoroethylene) ○ ≥ 1mm ID and ≤ 850 mm in length STERRAD 100NX and 100NX with ALLClear Technology Express Cycle: Metal and nonmetal devices surfaces and instruments which have diffusion-restricted spaces, such as the hinged portion of forceps and scissors. STERRAD 100NX and 100NX with ALLClear Technology Duo Cycle:	• ≥ 0.7 mm ID and ≤ 500 mm in length	
	 Medical devices including: most flexible endoscopes with a single channel of polyethylene and Teflon (polytetrafluoroethylene) with ≥ 1 mm ID and ≤ 875 mm in length accessory devices that are normally connected to a flexible endoscope during use flexible endoscopes without lumens 	 Medical devices including: most flexible endoscopes with a single channel of polyethylene and Teflon (polytetrafluoroethylene) with ≥ 1 mm ID and ≤ 875 mm in length accessory devices that are normally connected to a flexible endoscope during use flexible endoscopes without lumens 	
Vent to Volume Ratio	All trays are the same: 0.135 in ⁻¹	All trays are the same: 0.135 in ⁻¹	Same
Tray Composition	Mineral-filled polypropylene, stainless steel	Mineral-filled polypropylene, stainless steel	Same
Instrument Organizer Composition	Medical Grade Silicone, USP grade VI	Medical Grade Silicone, USP grade VI	Same
Mat Composition	Medical Grade Silicone, USP grade VI	Medical Grade Silicone, USP grade VI	Same

6. Summary of Non-clinical Tests

Performance testing to demonstrate substantial equivalence to the predicate has been completed and is summarized in **Table 5-5** below.

Table 5-5. Summary of Non-clinical Testing

Test	Result	Conclusion
Demonstration of Effective Sterilant Penetration	Cycle specific test articles shall be reproducibly sterilized under ½ cycle conditions for the V-PRO maX 2 Specialty Cycle	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 at least as well as the legally marketed predicate device (K222440), Class II (21 CFR 880.6850), product code KCT.