



July 31, 2025

Siemens Medical Solutions USA, Inc.
Alaine Medio
Manager, Regulatory Affairs
Siemens Medical Solutions USA, Inc.
810 Innovation Drive, Knoxville, TN 37322 USA

Re: K251561

Trade/Device Name: Biograph Trinion
Regulation Number: 21 CFR 892.1200
Regulation Name: Emission computed tomography system
Regulatory Class: Class II
Product Code: KPS, JAK
Dated: July 2, 2025
Received: July 2, 2025

Dear Alaine Medio:

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 (the 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 available 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.

Additional information about changes that may require a new premarket notification are provided in the FDA guidance documents entitled "Deciding When to Submit a 510(k) for a Change to an Existing Device" (<https://www.fda.gov/media/99812/download>) and "Deciding When to Submit a 510(k) for a Software Change to an Existing Device" (<https://www.fda.gov/media/99785/download>).

Your device is also subject to, among other requirements, the Quality System (QS) regulation (21 CFR Part 820), which includes, but is not limited to, 21 CFR 820.30, Design controls; 21 CFR 820.90, Nonconforming product; and 21 CFR 820.100, Corrective and preventive action. Please note that regardless of whether a change requires premarket review, the QS regulation requires device manufacturers to review and approve changes to device design and production (21 CFR 820.30 and 21 CFR 820.70) and document changes and approvals in the device master record (21 CFR 820.181).

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 Part 803) for devices or postmarketing safety reporting (21 CFR Part 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 Part 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR Parts 1000-1050.

All medical devices, including Class I and unclassified devices and combination product device constituent parts are required to be in compliance with the final Unique Device Identification System rule ("UDI Rule"). The UDI Rule requires, among other things, that a device bear a unique device identifier (UDI) on its label and package (21 CFR 801.20(a)) unless an exception or alternative applies (21 CFR 801.20(b)) and that the dates on the device label be formatted in accordance with 21 CFR 801.18. The UDI Rule (21 CFR 830.300(a) and 830.320(b)) also requires that certain information be submitted to the Global Unique Device Identification Database (GUDID) (21 CFR Part 830 Subpart E). For additional information on these requirements, please see the UDI System webpage at <https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/unique-device-identification-system-udi-system>.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR 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-devices/medical-device-safety/medical-device-reporting-mdr-how-report-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](#)) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Krainak', is positioned over a large, light blue, semi-transparent watermark of the letters 'FDA'.

Daniel M. Krainak, Ph.D.
Assistant Director
DHT8C: Division of Radiological
Imaging and Radiation Therapy Devices
OHT8: Office of Radiological Health
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

Indications for Use

510(k) Number (if known)

K251561

Device Name

Biograph Trinion

Indications for Use (Describe)

The Siemens PET/CT systems are combined X-Ray Computed Tomography (CT) and Positron Emission Tomography (PET) scanners that provide registration and fusion of high resolution physiologic and anatomic information.

The CT component produces cross-sectional images of the body by computer reconstruction of X-Ray transmission data from either the same axial plane taken at different angles or spiral planes taken at different angles. The PET subsystem images and measures the distribution of PET radiopharmaceuticals in humans for the purpose of determining various metabolic (molecular) and physiologic functions within the human body and utilizes the CT for fast attenuation correction maps for PET studies and precise anatomical reference for the fused PET and CT images.

The system maintains independent functionality of the CT and PET devices, allowing for single modality CT and/or PET diagnostic imaging.

These systems are intended to be utilized by appropriately trained health care professionals to aid in detecting, localizing, diagnosing, staging and restaging of lesions, tumors, disease and organ function for the evaluation of diseases and disorders such as, but not limited to, cardiovascular disease, neurological disorders and cancer. The images produced by the system can also be used by the physician to aid in radiotherapy treatment planning and interventional radiology procedures.

This system can be used for low dose lung cancer screening in high risk populations.*

* As defined by professional medical societies. Please refer to clinical literature, including the results of the National Lung Screening Trial (N Engl J Med 2011; 365:395-409) and subsequent literature, for further information.

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.

This section applies only to requirements of the Paperwork Reduction Act of 1995.

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K251561

510(k) Summary

as required by 21 CFR Part 807.87(h)

Identification of the Submitter

Submitter: Alaine Medio
Regulatory Affairs Manager
Siemens Medical Solutions USA, Inc.
Molecular Imaging
810 Innovation Drive
Knoxville, TN 37932

Alternative Contact: Tabitha Estes
Regulatory Affairs

Manufacturer: Siemens Medical Solutions USA, Inc.
Molecular Imaging
2501 North Barrington Road
Hoffman Estates, IL 60192

Telephone Number: (865)206-0337

Fax Number: (865)218-3019

Date of Submission: July 30, 2025

Identification of the product

Device Proprietary Name: Biograph Trinion

Common Name: Positron Emission Tomography (PET) System
Computed Tomography (CT) System

Classification Name: Emission Computed Tomography System per 21 CFR 892.1200
Computed Tomography X-Ray System per 21 CFR 892.1750

Product Code: KPS and JAK

Classification Panel: Radiology

Device Class: Class II

Marketed Devices to which Equivalence is claimed

Primary Predicate

Device:

Device Proprietary Name: Biograph Trinion PET/CT system

Manufacturer: Siemens Medical Solutions USA, Inc.

Product Code: KPS and JAK

Device Class: Class II

510(k) Number: K233677

Reference Predicate Devices:

	SOMATOM go.All and go.Top	Biograph Vision.X	MI View &Go
Manufacturer:	Siemens Medical Solutions USA, Inc.		
Product Code:	JAK	KPS	QIH
Device Class:	Class II		
510(k) Number:	K233650	K231833	K242300

Device Description:

Biograph Trinion PET/CT systems are combined multi-slice X-Ray Computed Tomography and Positron Emission Tomography scanners. This system is designed for whole body oncology, neurology and cardiology examinations. Biograph Trinion PET/CT systems provide registration and fusion of high-resolution metabolic and anatomic information from the two major components of each system (PET and CT). Additional components of the system include a patient handling system and acquisition and processing workstations with associated software.

Biograph Trinion VK20 software is a command-based program used for patient management, data management, scan control, image reconstruction and image archival and evaluation. All images conform to DICOM imaging format requirements.

Biograph PET/CT systems, which are the subject of this application, are substantially equivalent to the commercially available Biograph Trinion VK10 family of PET/CT systems (K233677). Differences compared to the commercially available Biograph Trinion systems include:

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- The commercially available SOMATOM go.All and go.Top systems with VB10 (K233650) software have been incorporated into the Biograph Trinion VK20 systems, including commercially available CT features.
 - Additional PET axial field of view (FoV) systems allowing for more scalability.
 - Additional patient communication and comfort features.
 - PET respiratory gating with an external gating device has been implemented.

The Biograph Trinion models may also use the names Biograph Mission, Biograph Wonder, Biograph Ambition and Biograph Devotion for marketing purposes.

Indications for Use:

The Siemens PET/CT systems are combined X-Ray Computed Tomography (CT) and Positron Emission Tomography (PET) scanners that provide registration and fusion of high resolution physiologic and anatomic information.

The CT component produces cross-sectional images of the body by computer reconstruction of X-Ray transmission data from either the same axial plane taken at different angles or spiral planes taken at different angles. The PET subsystem images and measures the distribution of PET radiopharmaceuticals in humans for the purpose of determining various metabolic (molecular) and physiologic functions within the human body and utilizes the CT for fast attenuation correction maps for PET studies and precise anatomical reference for the fused PET and CT images.

The system maintains independent functionality of the CT and PET devices, allowing for single modality CT and/or PET diagnostic imaging.

These systems are intended to be utilized by appropriately trained health care professionals to aid in detecting, localizing, diagnosing, staging and restaging of lesions, tumors, disease and organ function for the evaluation of diseases and disorders such as, but not limited to, cardiovascular disease, neurological disorders and cancer. The images produced by the system can also be used by the physician to aid in radiotherapy treatment planning and interventional radiology procedures.

This system can be used for low dose lung cancer screening in high risk populations.*

* As defined by professional medical societies. Please refer to clinical literature, including the results of the National Lung Screening Trial (N Engl J Med 2011; 365:395-409) and subsequent literature, for further information.

There is no change to the Intended Use / Indications for use as compared to the commercially available Biograph Trinion PET/CT Scanners.

Performance Testing / Safety and Effectiveness:

Performance testing for the CT subsystem was included in the original premarket notification for the CT subsystems and there have been no changes affecting this testing.

PET Testing in accordance with NEMA NU 2: 2024 was conducted on the system and all performance testing met the predetermined acceptance values. The following NEMA performance tests were conducted:

- Spatial Resolution
- Scatter Fraction, Count Losses, and Randoms
- Sensitivity
- Accuracy: Corrections for Count Losses and Randoms
- Image Quality, Accuracy of Corrections
- Time-of-Flight Resolution
- PET-CT Coregistration Accuracy

This testing performed the same as or better than the commercially available Biograph Trinion VK10 family of PET/CT systems (K233677).

The device labeling contains instructions for use and any necessary cautions and warnings to provide for safe and effective use of the device.

Risk Management is ensured via a risk analysis in compliance with ISO 14971 to identify and provide mitigation to potential hazards beginning early in the design cycle and continuing throughout the development of the product. Siemens Medical Solutions, USA Inc. adheres to recognized and established industry standards such as IEC 60601-1 series and 21 CFR 1020.30 and 21 CFR 1020.33 to minimize electrical, mechanical and radiation hazards.

Siemens Medical Solutions USA, Inc claims compliance with the following product standards for the Biograph Trinion VK20 PET/CT Systems:

- IEC 60601-1: 2005+ A1:2012 +A2:2020-- [Rec #19-49]
- IEC 60601-1-2: 2020 – [Rec #19-36]
- IEC 60601-1-3: 2008 + A1:2013 – [Rec # 12-336]
- IEC 60601-1-6:2010 +A1:2013 + A2:2020 – [Rec # 5-132]
- IEC 60601-2-28:2017 – [Rec # 12-309]
- IEC 60601-2-44: 2016 – [Rec # 12-302]
- IEC 60825-1: 2007 – [Rec # 12-273]
- IEC 62366-1: 2015 +A1:2020 – [Rec # 5-129]
- ISO 10993-1: 2018 – [Rec # 2-258]
- IEC 61223-3-5:2019 – [Rec # 12-328]

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- NEMA NU 2: 2018 – [Rec # 12-326]
 - NEMA NU 2:2024
 - NEMA XR 25: 2019 – [Rec #12-325]
 - NEMA PS3.1-3.20 2023e – [Rec # 12-352]

Additionally, the Biograph systems have been developed in accordance with the requirements of the following standards:

- IEC 62304:2015 – [Rec # 13-79]
- ISO 14971:2019 – [Rec # 5-125]
- ISO 13485:2015

Cybersecurity information in accordance with FDA Guidance documents has been provided. The Biograph software has specific cybersecurity controls to prevent unauthorized access, modifications, misuse or denial of use. Additionally, controls are enabled to prevent the unauthorized use of information that is stored, accessed or transferred between the Biograph systems and external devices.

Verification and validation of Siemens Medical Solutions USA, Inc. systems is performed in accordance with documented procedures, design and code reviews, test plans and specifications. Traceability of the requirements specified in the requirement specifications and functional specifications is ensured during component integration, software validation and system testing.

Statement regarding Substantial Equivalence:

There have been no changes implemented in the Biograph system that impacts either the fundamental technology or the indications for use as compared to the predicate. The Biograph PET/CT systems outlined in this Premarket Notification are substantially equivalent to the currently commercially available predicate devices.