510(K) SUMMARY  
ARTHROCARE CORPORATION  
OPUS TWILOCK KNOTLESS FIXATION DEVICE

General Information

Submitter Name/Address: ArthroCare Corporation  
680 Vaqueros Avenue  
Sunnyvale, CA 94085-3523

Establishment Registration No.: 2951580

Contact Person: Laura N. Kasperowicz  
Sr. Manager, Regulatory Affairs

Date Prepared: May 15, 2007

Device Description

Trade Name: Opus® TwinLock™ Knotless Fixation Device

Generic/Common Name: Bone Anchor, Fastener, Fixation, Soft Tissue

Classification Name: Fastener, Fixation, Nondegradeable, Soft Tissue  
(Class II per 21 CFR 888.3040, Product code: MBI)

Predicate Devices

Opus MiniMagnum  
K042584 (Cleared 12/14/04)

Product Description

The Opus® TwinLock™ device is a bone anchor system with inserter handle designed for specific indications in arthroscopic and orthopedic procedures.

Indications For Use

The Opus® TwinLock™ device is a bone anchor system with inserter that is indicated for use in fixation of soft tissue to bone. Examples of such procedures include:

Shoulder: Bankart repair, SLAP lesion repair, acromio-clavicular separation, rotator cuff repair, capsule shift/capsule-labral reconstruction, biceps tenodesis and deltoid repair

Ankle: Lateral instability, medial instability, Achilles tendon repair/reconstruction and midfoot reconstruction

Foot: Hallux valgus reconstruction

Elbow: Tennis elbow repair, biceps tendon attachment

Knee: Extra-capsular repairs; reattachment of: medial collateral ligament, posterior oblique ligament or joint capsule closure to anterior proximal tibia; extra capsular reconstruction, ITB tenodesis; patellar ligament and tendon avulsions
510(k) SUMMARY

Substantial Equivalence
By definition, substantial equivalence means that a device has the same intended use and technical characteristics as the predicate device, or has the same intended use and different technological characteristics, but can be demonstrated to be as safe and effective as the predicate device. The Opus TwinLock design and technology is substantially equivalent to the existing Opus MiniMagnum Knotless Fixation Device cleared by the Food & Drug Administration [K042584]. The differences between the Opus TwinLock and the predicate devices do not raise any questions regarding the safety and effectiveness of the implant. Furthermore, the materials are well characterized and have been used in predicate devices with similar indications. The device, as designed, is as safe and effective as predicate devices.

Summary and Reason for 510k Notification
The purpose of this 510k is to notify the Food and Drug Administration of a new product, the Opus TwinLock Knotless Fixation Device. This new product is substantially equivalent to the Opus MiniMagnum Knotless Fixation Device originally cleared under K042584.
Dear Ms. Kasperowicz:

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. 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.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such 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); 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 our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at (240) 276-0120. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding postmarket surveillance, please contact CDRH’s Office of Surveillance and Biometric’s (OSB’s) Division of Postmarket Surveillance at (240) 276-3474. For questions regarding the reporting of device adverse events (Medical Device Reporting (MDR)), please contact the Division of Surveillance Systems at (240) 276-3464. You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at toll-free number (800) 638-2041 or (240) 276-3150 or the Internet address http://www.fda.gov/cdrh/industry/support/index.html.

Sincerely yours,

Mark N. Melkerson
Director
Division of General, Restorative
and Neurological Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure
INDICATIONS FOR USE STATEMENT

510(k) Number: K 071374

Device Name: Opus® TwinLock™ Knotless Fixation Device

Indications for Use:

The Opus TwinLock bone anchor with inserter is indicated for use in fixation of soft tissue to bone. Examples of such procedures include:

**Shoulder:** Bankart Repair, SLAP lesion repair, acromio-clavicular separation, rotator cuff repair, capsule shift/capsule-labral reconstruction, biceps tenodesis and deltoid repair

**Ankle:** Lateral instability, medial instability, Achilles tendon repair/reconstruction and midfoot reconstruction

**Foot:** Hallux valgus reconstruction

**Elbow:** Tennis elbow repair, biceps tendon attachment

**Knee:** Extra-capsular repairs; reattachment of: medial collateral ligament, posterior oblique ligament or joint capsule closure to anterior proximal tibia; extra capsular reconstruction, ITB tenodesis; patellar ligament and tendon avulsions

**Prescription Use** (Part 21 CFR 801 Subpart D)  **X**  **AND/OR**  **Over-The-Counter Use** (21 CFR 801 Subpart C)  **NO**

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

Concurrence of CDRH, Office of Device Evaluation (ODE)

[Signature]
(Division Sign-Off)
Division of General, Restorative, and Neurological Devices

510(k) Number: K071374