

**SPECIAL 510(K): DEVICE MODIFICATION
OIR DECISION MEMORANDUM**

510(k) Number: K190294

This 510(k) submission contains information/data on modifications made to the applicant's own class II or class I devices requiring 510(k). The following items are present and acceptable:

1. The name and 510(k) number of the applicant's previously cleared device. CELL-DYN Emerald 22 System; K110381.
2. Applicant's statement that the **INDICATION/INTENDED USE** of the modified device as described in its labeling **HAS NOT CHANGED** along with the proposed labeling which includes instructions for use, package labeling, and, if available, advertisements or promotional materials.
3. A description of the device **MODIFICATION(S)**, including clearly labeled diagrams, engineering drawings, photographs, user's and/or service manuals in sufficient detail to demonstrate that the **FUNDAMENTAL SCIENTIFIC TECHNOLOGY** of the modified device **has not changed**.

This change was for the addition of a sample autoloader to automate sample processing by transferring, mixing, and unloading sample racks. Modifications made due to the addition of the autoloader include: open/close tube operation, sampling module, operating system and the system board.

4. **Comparison Information** (similarities and differences) to applicant's legally marketed predicate device including, labeling, intended use, and physical characteristics are located in the 510(k) Summary.
5. A **Design Control Activities Summary** which includes:
 - a) Identification of Risk Analysis method(s) used to assess the impact of the modification on the device and its components, and the results of the analysis
 - b) Based on the Risk Analysis, an identification of the verification and/or validation activities required, including methods or tests used and acceptance criteria to be applied.

The labeling for this modified subject device has been reviewed to verify that the indication/intended use for the device is unaffected by the modification. In addition, the applicant's description of the particular modification(s) and the comparative information between the modified and unmodified devices demonstrate that the fundamental scientific technology has not changed. The applicant has provided the design control information as specified in The New 510(k) Paradigm and on this basis, I recommend the device be determined substantially equivalent to the previously cleared (or their preamendment) device.