SECTION 2.0 - SUMMARY OF SAFETY AND EFFECTIVENESS

September 29, 2008 (revised October 31, 2008)

This summary is being included in the Premarket Notification submission in lieu of a statement of availability.

COMPANY NAME, ADDRESS AND TELEPHONE NUMBER

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Contact Person: Deep Pal

Regulatory Affairs Specialist

ESTABLISHMENT REGISTRATION NUMBER

2126666

DEVICE TRADE NAME/PROPRIETARY NAME

FREEWAY™ and RAILRUNNER™ Guidewires

DEVICE COMMON NAMES/USUAL NAMES/CLASSIFICATION NAMES

These devices are commonly known as guides, Guidewires, or spring Guidewires. The current classification names and product codes are Angiographic Guidewire (74HAP), Catheter Guidewire (74DQX), and Radiological Catheter Guidewire (74JAJ).

CLASSIFICATION OF DEVICES

The classification names listed above were originally classified as Class II devices by the Neurology (84HAD), Cardiovascular (74DQX), and Radiology (90JAJ) Review Panels, respectively.

APPLICABILITY OF PERFORMANCE STANDARDS

LRM has determined that no mandatory performance standards have been established for these devices under Section 514 of the Medical Amendments to Federal Food, Drug, and Cosmetic Act or by any subsequent regulatory action. LRM has also determined that there are no applicable voluntary standards.

DEVICE DESCRIPTION

These Freeway™ and Railrunner™ Guidewires are composed of two primary components: A PTFE coated stainless steel steerable core body, and a radiopaque platinum alloy distal coil. The coil is secured in its location by solder, which is attached to the core. The coil is attached to the core at the distal end, proximal end of the coil, and at a midpoint section (intermediate joint). The product is offered with a shapeable straight tip or in a pre-shaped configuration. The Guidewires are optionally coated with MDX (silicone) over the distal tip and hydrophilic coating over portions of the distal tip of the Guidewire. The Guidewires are bound by the following parameters:

Outside Diameter: .014"

Lengths:

175cm - 300 cm

Tips:

Straight or shaped

Flexibility:

FREEWAY - 3 and 6 gm and RAILRUNNER - 9 and 12 gm distal

loads

SECTION 2.0 - SUMMARY OF SAFETY AND EFFECTIVENESS (continued...)

TECHNOLOGICAL CHARACTERSTICS

The design specifications are substantially similar to the existing PTCA Guidewires cleared under 510(k) K970376 and K041624 except that these designs include stiffer tip flexibilities which are similar to the Asahi Wire Asahi PTCA Guide Wire Confianza Pro Guidewire cleared under 510(k) K041531.

QUALITY SYSTEM CONTROLS

DESIGN CONTROL

LRM is in conformance with the design control procedure requirements as specified in 21 CFR 820.30. Risk analysis was completed by means of a Failure Mode and Effect Analysis (FMEA) and all verification and validation activities resulted in the ability to demonstrate that the predetermined acceptance criteria were met.

MATERIAL/SUPPLIER/PRODUCT/PROCESS CONTROLS

LRM has formal quality systems in place to assure that each product manufactured remains equivalent to the predicate products, and that the changes will not have an adverse affect on the safe and effective use of the product. The quality systems include Engineering Change Order Review, Material Qualification, Supplier Qualification, Product Qualification, and Process Qualification. These controls are applied to each product size/group.

QUALIFICATION TESTING

NON-CLINICAL TESTS

In order to demonstrate equivalence of the Freeway™ and Railrunner™ Guidewire iterations, LRM performed testing to established requirements. Test pieces were tested and inspected according to established specific inspection criteria requirements for visual/tactile, dimensional and mechanical attributes. The results of these tests demonstrated the functionality and performance characteristics of these Guidewires are comparable to the currently marketed devices.

BIOCOMPATIBILITY TESTING

Biocompatibility testing per ISO 10993 series has been performed on the Freeway™ and Railrunner™ devices and has been found to be acceptable.

SUBSTANTIAL EQUIVALENCE DATA

Lake Region believes the Freeway[™] and Railrunner[™] Guidewire iterations are substantially equivalent to the predicate devices cleared under 510(k) *K970376*, *K041624* and *K041531*. All non-clinical test results support the claim of substantial equivalence to the predicate devices.

INTENDED USE STATEMENT

For use in Angiographic procedures to introduce and position catheters and interventional devices within the coronary and peripheral vasculature.

NOTE: The modification of this device does not alter its intended use.





Food and Drug Administration 9200 Corporate Boulevard Rockville MD 20850

DEC -9 ...

Lake Region Medical c/o Mr. Deep Pal Regulatory Affairs Specialist 340 Lake Hazeltine Drive Chaska, MN 55318-1029

Re: K082922

Trade/Device Name: FREEWAY and RAILRUNNER Guidewires

Regulation Number: 21 CFR 870.1330 Regulation Name: Catheter Guidewire

Regulatory Class: Class II

Product Code: DQX

Dated: November 3, 2008 Received: December 4, 2008

Dear Mr. Pal:

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 <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); 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 Center for Devices and Radiological Health's (CDRH's) 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 Biometrics' (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 its toll-free number (800) 638-2041 or (240) 276-3150 or at its Internet address http://www.fda.gov/cdrh/industry/support/index.html.

Sincerely yours,

Bram D. Zuckerman, M.D.

Director

Division of Cardiovascular Devices

Office of Device Evaluation

Center for Devices and

Radiological Health

Enclosure

INDICATIONS FOR USE

510(k) Number (if known): K082922		
Device Name:FREEWAY™ and RAILRUNNER™ Guidewires		
Indications for Use: For use in Angiographic procedure devices within the coronary and peri	es to introduce and pheral vasculature.	position catheters and interventional
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Prescription Use X (Part 21 CFR 801 Subpart D)	AND/OR	Over-The-Counter Use(21 CFR 807 Subpart C)
(PLEASE DO NOT WRITE BELOW THIS LINE - CONTINUE ON ANOTHER PAGE IF NEEDED)		
Concurrence of CDRH, Office of Device Evaluation (ODE)		
(Division sign-Off)		
Division of Cardiovascular Devices		Page 1 of
510(k) Number <u> </u>	922	

PAGE 9-1