13.   SUBMITTING TEXT FILES OR IMAGE FILES

To provide full text search capability for relevant documents, Section 2.1003(a)(1) of the LSN Rule requires the NRC, DOE, potential parties, parties, and interested governmental participants to provide an "electronic **file**" for all documentary material. For "graphic-oriented" documentary material, an "electronic **image**" must be provided under Section 2.1003(a)(2) in lieu of the text file. A bibliographic header file is required to be submitted to the LSN with either type of documentary material. Providing only images for textual documentary material would be contrary to the NRC's requirements and to the objective of providing full text search capability for participant documentary materials.

Graphic-oriented material consists of such items as raw data, field notes, maps, and photographs. Any text embedded within graphic-oriented documentary material (e.g., the data filled in by hand, typewriter, or computer within each block of a form) does not need to be submitted separately in searchable full text (i.e., as an "electronic file"). Graphic-oriented material will be searchable using the bibliographic header material submitted by the participant.

Additionally, online electronic images (as well as the required electronic text files) may be provided for all documents to meet the authenticated image access requirement under Section 2.1003 of the LSN Rule, not just for "graphic-oriented" documentary material. The NRC has no objection to this enhancement, but emphasizes that it is not a requirement under the LSN Rule. If a participant chooses to make a text document's corresponding images available on the web, those images must:

•   meet the standards for an official record version if they are offered to comply with the requirement in Section 2.1003 of the LSN Rule for providing "an authentication statement that indicates where an authenticated image copy can be obtained," or

•   identify individually for each image whether it is or is not an authenticated image. This is necessary because non-text "graphic-oriented" document images must be an authenticated image, whereas a text document's image might only be a convenience, and users must be able to distinguish which are authenticated and which are not.

If an electronic image is not provided with an electronic file, the "Comments" field in the bibliographic header may be used to document where an image version of a text document may be obtained.

The URL for the electronic file(s) and electronic image(s), as applicable, must be entered into the bibliographic header for all documentary material, unless privileged. The electronic file URL(s) must be entered into the "Text URL" field, and the electronic image URL(s) must be entered into the "Image URL" field.

13.1   Treatment of Forms

Forms that contain a high percentage of blocks and lines that would be misinterpreted as the number "1" or the letter "L" by OCR software should be considered "graphic-oriented" by the participant, and an electronic image file should be provided in lieu of an electronic text file.