

### 13. SUBMITTING TEXT FILES OR IMAGE FILES

To provide full text search capability for relevant documents, § 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 § 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 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 retrievable from 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 obligations under § 2.1003, 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 in response to meeting requirements for “notifying parties where an authenticated image may be acquired,” or
- identify individually for each image whether it is or is not an authenticated image. This is necessary because non-text document images must be an authenticated image, whereas a text document’s image might only be a convenience and users will not be able to distinguish which are authenticated and which are not.

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

The URL of the electronic file(s) and electronic image(s), as applicable, must be entered into the bibliographic header for all documentary material. 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.