

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)

NORTHERN INDIANA PUBLIC)
SERVICE COMPANY (Bailly)
Generating Station,)
Nuclear-1))

Docket No. 50-367
(Construction Permit
Extension)

PORTER COUNTY CHAPTER INTERVENORS'
FOURTH REQUEST TO NIPSCO
FOR PRODUCTION OF DOCUMENTS

Porter County Chapter of the Izaak Walton League of America, Inc.; Concerned Citizens Against Bailly Nuclear Site; Businessmen for the Public Interest, Inc.; James E. Newman and Mildred Warner ("Porter County Chapter Intervenor"), by their attorneys, pursuant to 10 CFR §2.741, hereby request that Northern Indiana Public Service Company ("NIPSCO") produce for inspection and copying on Tuesday, June 23, 1981, at 10:00 A.M. at the offices of Business and Professional People for the Public Interest, Suite 1300, 109 North Dearborn, Chicago, Illinois 60602, the documents described herein.

The term "document" means any writing or recording of any kind, however produced or reproduced, including but not limited to letters, telegrams, memoranda, reports, studies, tape recordings, computer printouts, photographs, calendar and diary entries, minutes, pamphlets, notes, charts, tabulations and records of meetings, conferences and telephone or other conversations or meetings, which are in the actual or constructive possession, custody or control of NIPSCO. A described

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document includes all other documents which are attached to or relate to such document. The term "NIPSCO" includes Northern Indiana Public Service Company, its agents, employees, representatives, subsidiaries, and those consultants, contractors or subcontractors over whom NIPSCO retains control. The term "Bailly" refers to the Bailly Generating Station, Nuclear 1. The term "NRC" includes the United States Nuclear Regulatory Commission, its staff, members, attorneys, employees, consultants, divisions or subdivisions, contractors and subcontractors. The term "Interrogatory" refers to Porter County Chapter Intervenor's Second Set of Interrogatories to NIPSCO, filed May 19, 1981.

1. All written communications, and all notes and records of all oral communications, between any employee or officer of NIPSCO and any or all members of NIPSCO's Board of Directors concerning the Bailly nuclear plant.

2. All minutes of all meetings of NIPSCO's Board of Directors from the earliest meeting at which the possibility of construction of any nuclear power plant, including but not limited to Bailly, was mentioned.

3. All records of corporate action with respect to the Bailly plant authorized, directed, approved, or ratified by NIPSCO's Board of Directors.

4. All documents described in PCCI's First, Second and Third Requests to NIPSCO for Production of Documents which have been generated, or which have come to NIPSCO's attention

or possession, since NIPSCO's responses to those requests were filed.

5. All documents on which NIPSCO's responses to Interrogatory 3 is based.

6. All documents on which NIPSCO's response to Interrogatory 5 is based.

7. All documents related to NIPSCO's response to Interrogatory 6.

8. All documents related to the geological investigations described or referred to in NIPSCO's responses to Interrogatories 7, 8, and 9.

9. All documents described in NIPSCO's responses to Interrogatories 10(d), 10(e) and 10(f)(iii).

10. All documents described in NIPSCO's responses to Interrogatories 11(c), 11(d), and 11(e)(iii).

11. All documents described in NIPSCO's responses to Interrogatory 12(d).

12. The letter from William H. Eichhorn to Dr. J.K. McClusky of the NIPSCO Nuclear Staff dated April 29, 1974, which was produced to PCCI on May 4, 1981 and subsequently withdrawn by NIPSCO.

13. "Contract Between Northern Indiana Public Service Company and General Electric Company for Nuclear Fuel and Related Services for Bailly Generating Station, Nuclear 1" dated September 5, 1969 (Draft 1/27/72) produced to PCCI on May 4, 1981 and subsequently withdrawn by NIPSCO.

14. All meeting notes of NIPSCO's nuclear staff meetings.
15. All documents in the file labeled "Estimates - N1".

Dated: May 19, 1981

Respectfully submitted,

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BY: Jane M. Whicher

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