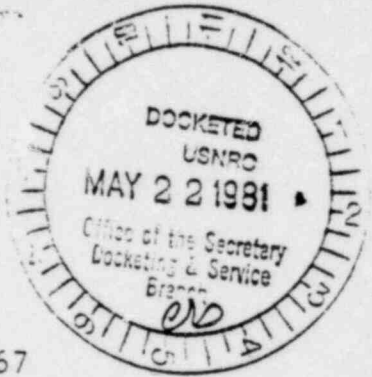


UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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'  
SECOND REQUEST TO THE NRC  
FOR PRODUCTION OF DOCUMENTS

Porter County Chapter Intervenor, by their attorneys, pursuant to 10 CFR §2.744, hereby request that the Staff of the Nuclear Regulatory Commission produce, for inspection and copying on Tuesday, June 23, 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, those of the documents described herein which are not available to Porter County Chapter Intervenor pursuant to 10 CFR §2.790 in the Public Document Room of the NRC.

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 the NRC. A described document includes

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all other documents which are attached to or relate to such documents, including but not limited to drafts of the described documents. The term "NIPSCO" includes Northern Indiana Public Service Company, its agents, employees, representatives, subsidiaries, consultants, contractors, subcontractors or attorneys. The term "Bailly" refers to the Bailly Generating Station, Nuclear-1. The terms "staff" and "NRC" include 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 First Set of Interrogatories to the NRC staff filed May 19, 1981.

1. All written communications and all memoranda and notes of communications and conversations between NIPSCO and the staff regarding the fact that construction of the Bailly plant was not completed by the latest completion date contained in the construction permit.

2. All written communications and all memoranda and notes of communications and conversations between NIPSCO and the staff regarding NIPSCO's requests to extend the latest completion date for the Bailly plant.

3. All written communications and all memoranda and notes of communications and conversations between NIPSCO and the staff regarding the staff review of each of NIPSCO's foundation plans.

4. All contracts between the NRC and consultants listed in the staff's response to Interrogatory 8, and all documents pertaining to the retaining or hiring of such consultants, including but not limited to all documents consulted or referred to in the preparation of the response to Interrogatory 8, and all documents upon which the decision to retain or hire each consultant was based.

5. All documents upon which the staff's response to Interrogatory 5 is based.

6. All documents upon which the staff's response to Interrogatory 7 is based.

7. All documents listed in the staff's response to Interrogatory 8(d), 8(e) and 8(f)(iii).

8. All documents listed in the staff's response to Interrogatory 9(d), 9(e) and 9(f)(iii).

9. All documents listed in the staff's response to Interrogatory 10(d).

10. All documents related to, referring to, or prepared in connection with the letter to Harold R. Denton from NIPSCO by E.M. Shorb dated November 26, 1980.

11. All documents related to the timing of the issuance of the "Safety Evaluation Report Related to the Pile Foundation Design and Installation", dated March, 1981.

12. All documents upon which the staff's response to Interrogatory 11 is based.

13. All documents, described in PCCI's First Request to the NRC Staff for Production of Documents, which have been generated, or which have come to the staff's attention or possession, since the staff's responses to that request were filed.

Dated: MAY 19, 1981

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