

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)

6/19/81

PEOPLE OF THE STATE OF ILLINOIS' FIRST
SET OF INTERROGATORIES TO NIPSCO



People of the State of Illinois, by its attorney, TYRONE C. FAHNER, Attorney General, pursuant to 10 CFR §2.740b, hereby serves upon Northern Indiana Public Service Company ("NIPSCO") the following Interrogatories to be answered separately and fully in writing under oath by its officer or agent, within 14 days of the date of service.

1. If any of the following Interrogatories cannot be answered in full, please so state, and answer to the fullest extent possible.
2. "Identify" when used in reference to a person means to state his/her full name and present address, if known, and his/her present or last known position and business affiliation.
3. For any study or report identified in answer to any Interrogatory, identify the page(s) at which the relevant information appears.
4. "NIPSCO," when referred to in these Interrogatories, includes NIPSCO's employees, agents, and contractors.

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1. (a) Did the NRC Staff review of the NIPSCO short pilings proposal delay construction of Bailly.
(b) If the answer to Interrogatory 1(a) is yes, how many months' delay does NIPSCO attribute to the Staff review.
2. (a) Is it NIPSCO's position that NIPSCO was legally prevented from proceeding with construction of Bailly during the Staff review of the NIPSCO short pilings proposal.
(b) If the answer to Interrogatory 2(a) is yes, explain the legal reason NIPSCO was prevented from proceeding with construction of Bailly.
(c) If the answer to Interrogatory 2(a) is no, explain why NIPSCO did not continue with construction after September 28, 1977.
3. (a) Was NIPSCO or any of its contractors ever informed verbally or in writing by the Staff or the NRC that construction of Bailly should not proceed pending consideration by the Staff of the NIPSCO short pilings proposal.
(b) If the answer to Interrogatory 3(a) is yes:
 - (1) Identify the type(s) of communication(s) (e.g., letter, phone call, memo, conversation, etc.) by which NIPSCO or any of its contractors was so informed;
 - (2) Identify the date of such communication(s);
 - (3) Identify the parties to such communication(s);
 - (4) Identify the person initiating such communication(s); and
 - (5) State the substance of such communication(s).

4. On what date was groundwater first exposed at the Bailly site due to construction activity.
5. Identify the person at Sargent & Lundy, at Dames & Moore, and at Groundwater Technology, Inc., who supervised or was primarily responsible for the preparation of the August 27, 1979 report entitled "Supplementary Information, Hydrogeologic Evaluation of Construction Dewatering, Bailly Generating Station Nuclear 1."
6. Identify the person at D'Appolonia who supervised or was primarily responsible for the preparation of the November 1980 report entitled "Assessment of the Influence of Dewatering at Bailly N-1."
7. (a) Will dewatering of the Bailly site continue after construction of Bailly is completed.
(b) If the answer to Interrogatory 7(a) is yes:
 - (1) For how long after construction is completed will dewatering of the Bailly site continue.
 - (2) Why will dewatering continue after construction of Bailly is completed.
 - (3) Identify the person(s) who determined that dewatering will continue after construction of Bailly was completed.
 - (4) State the date or the approximate date on which it was determined that dewatering of Bailly will continue after construction was completed.
8. (a) For what period of time prior to completion of the con-

struction of Bailly does NIPSCO plan to dewater at the Bailly site.

(b) Identify the person who determined the period of time identified in answer to Interrogatory 3(a).

(c) How many gallons of water per day will be removed from the Bailly site before construction of Bailly is completed.

9. As of the date of service of these Interrogatories, how much water has been removed by dewatering from the Bailly site since the groundwater was first exposed.

10. At the time CPPR-104 was issued, how much water did NIPSCO estimate would be removed from the Bailly site by dewatering due to construction and operation of Bailly.

11. How has NIPSCO disposed of the water which has been removed by dewatering from the Bailly site thus far.

12. (a) What is the lowest elevation the groundwater has reached at the Bailly site thus far due to construction dewatering.

(b) What is the lowest elevation which the groundwater will reach at the Bailly site due to construction dewatering.

13. (a) Please specify the greatest depth of drawdown of the groundwater levels which will occur if the Bailly site is dewatered to the elevation specified in the answer to Interrogatory 12(b) during construction of Bailly:

- (1) at 700 feet east of the Bailly site;
- (2) at 1/2 mile east of the Bailly site;
- (3) at 1 mile east of the Bailly site; and
- (4) at 2 miles east of the Bailly site.

(b) Identify the persons providing the information on which the answer to Interrogatory 13(a) is based and identify any studies, reports, or other information relied on in answering Interrogatory 13(a).

14. (a) Will the method, rate, or effects of dewatering of the Bailly site after September 1, 1979 be different in any respect from dewatering which occurred prior to September 1, 1979.

(b) If the answer to Interrogatory 14(a) is yes:

(1) How will dewatering differ after September 1, 1979.

(2) Why will dewatering differ after September 1, 1979.

15. (a) Will dewatering of the Bailly site affect in any way:

(1) Flora or fauna in the Indiana Dunes National Lakeshore.

(2) Flora or fauna in Cowles Bog.

(3) Bog indicator plants in Cowles Bog.

(b) If the answer to Interrogatory 15(a)(1), (2), or (3) is yes:

(1) Identify the flora, fauna or bog indicator plants which will be affected;

(2) Identify any studies, reports or other information relied on in answering Interrogatory 15(a)(1), (2), (3) and (b)(1); and

(3) Identify the person(s) providing the information on which the answer to Interrogatory 15(b)(2) is based.

16. (a) How does NIPSCO plan to mitigate effects on the Indiana Dunes National Lakeshore of pumping from Unit 3.

(b) (1) Identify the studies, reports or other information

relied on in answering Interrogatory 16(a); and

(2) Identify the person who supervised or was primarily responsible for preparing or providing such studies, reports or other information.

17. (a) Describe the direction(s) of groundwater flow in the Indiana Dunes National Lakeshore.

(b) Describe the rate(s) of groundwater flow in the Indiana Dunes National Lakeshore.

(c) Describe the chemical and physical characteristics (including pH) of Units 1 and 3 in the Indiana Dunes National Lakeshore.

(d) (1) Identify the studies, reports or other information relied on in answering Interrogatory 17(a); and

(2) Identify the person who supervised or was primarily responsible for preparing or providing such studies, reports or other information.

18. (a) How many times did NIPSCO drive test piles at the Bailly site.

(b) How many attempts were made by NIPSCO to insert piles by jetting.

(c) (1) How many monitoring wells have been installed by NIPSCO in connection with construction of Bailly.

(2) How many such monitoring wells have penetrated Unit 2.

(d) How many deep well points has NIPSCO installed at the Bailly site.

(e) How many pressure relief wells and/or free flowing drains has NIPSCO installed at the Bailly site.

(f) During pile-driving and/or jetting activities, did NIPSCO penetrate:

(1) Unit 2.

(2) The glacial lacustrine layer beneath Unit 3.

(g) (1) Does NIPSCO know what materials underlie Unit 3 at the Bailly site.

(2) If yes, describe the materials underlying Unit 3 at the Bailly site.

(h) How does NIPSCO plan to control the effects of any hydraulic interconnections created by virtue of pile-driving and jetting activities and installation of monitoring wells, deep well points, and pressure relief wells and/or free-flowing drains.

19. (a) Will dewatering at Bailly alter the subsoil structure at the Bailly site.

(b) (1) Will dewatering at the Bailly site affect subsoil structure at any distance from the Bailly site.

(2) If the answer to Interrogatory 19(b)(1) is yes, at what distance from the Bailly site will the subsoil structure be altered.

(c) Has dewatering of the Bailly site already affected the subsoil structure at the Bailly site.

(d) Identify the person(s) providing the information on which the answer to Interrogatory 19(a), (b), and (c) is based.

20. (a) Will dewatering at the Bailly site affect:

(1) The vibratory ground movement in the event of a seismic occurrence.

(2) The ability of Bailly to withstand loads induced by a seismic occurrence.

(3) The response parameters and soil stability characteristics for an Operating Basis Earthquake.

(4) The loads induced by a Safe Shutdown Earthquake.

(b) If the answer to Interrogatory 20(a)(1), (2), (3), or (4) is yes, identify the reports, studies or other information relied upon in answering that Interrogatory and the person who supervised or was primarily responsible for preparing or providing such reports, studies, or other information.

21. (a) Has there been any communication(s) between the NRC and NIPSCO about the effect of construction dewatering at the Bailly site on the subsoil structure.

(b) If the answer to Interrogatory 21(a) is yes:

(1) Identify the type of communication(s) (e.g., letter, memo, phone call, conversation etc.);

(2) Identify the date of such communication(s);

(3) Identify the parties to such communication(s);

(4) Identify the person initiating such communication(s); and

(5) State the substance of such communication(s).

22. (a) Has there been any communication(s) between NIPSCO and its contractors or between NIPSCO's contractors and subcontractors about the effect of construction dewatering at the Bailly site on

the subsoil structure.

(b) If the answer to Interrogatory 22(a) is yes:

(1) Identify the type of communication(s) (e.g., letter, memo, phone call, conversation etc.);

(2) Identify the date of such communication(s);

(3) Identify the parties to such communication(s);

(4) Identify the person initiating such communication(s); and

(5) State the substance of such communication(s).

23. (a) Will alteration of the subsoil structure due to construction dewatering at the Bailly site affect the susceptibility of the Bailly site to surface faulting.

(b) If the answer to Interrogatory 23(a) is yes:

(1) Identify the studies, reports or other information relied on in answering Interrogatory 23(a); and

(2) Identify the person who supervised or was primarily responsible for preparing or providing such studies, reports or other information.

24. (a) Will alteration of the subsoil structure due to construction dewatering at the Bailly site affect the magnitude of seismically induced floods and waves.

(b) If the answer to Interrogatory 24(a) is yes:

(1) Identify the studies, reports or other information relied on in answering Interrogatory 24(a); and

(2) Identify the person who supervised or was primarily

responsible for preparing or providing such studies, reports or other information.

25. (a) Could dewatering at the Bailly site result in liquefaction of subsoil structures at Bailly during a seismic occurrence.


(b) If yes, what will be the effect of the shortened pilings on the ability of Bailly to withstand loads induced by a seismic occurrence.

26. (a) Could dewatering at the Bailly site result in subsidence of subsoil structures at Bailly.

(b) If yes, what will be the effect of the shortened pilings on the ability of Bailly to withstand loads induced by a seismic occurrence.

Respectfully submitted,

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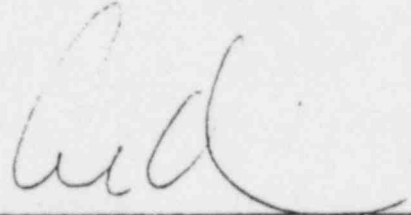
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CERTIFICATE OF SERVICE

I hereby certify that I served copies of the People of the State of Illinois' First Set of Interrogatories to NIPSCO on all persons on the attached Service List by causing them to be deposited in the U.S. mail, first class postage prepaid, on June 19, 1981.



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