

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

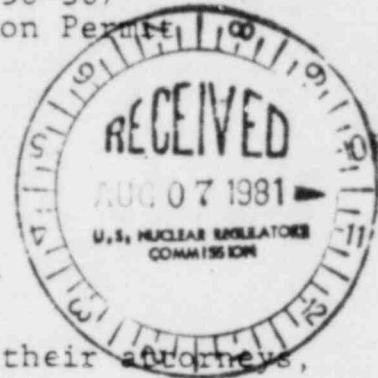
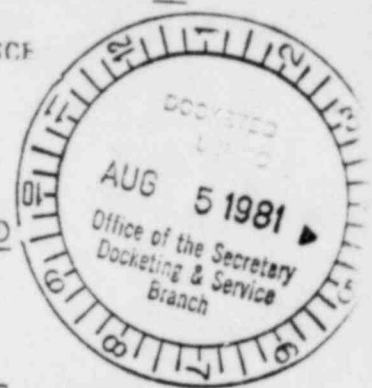
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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'
SECOND APPLICATION PURSUANT TO
10 CFR §2.720(h)(2)(ii)



Porter County Chapter Intervenor (PCCI), by their attorneys, hereby apply to the Board pursuant to 10 CFR §2.720(h)(2)(ii) for an order requiring the NRC staff to answer Porter County Chapter Intervenor's Second Set of Interrogatories to the NRC Staff, being filed simultaneously with this application. Because PCCI cannot adequately prepare its case without the staff's answers, they are necessary to PCCI's presentation of their case and evaluation of the staff's case, and thus to a proper decision in this proceeding. Since the interrogatories go to matters solely within the staff's knowledge, answers are not reasonably obtainable from any other source.

PCCI, therefore, request the Board to find, under 10 CFR §2.720(h)(2)(ii), that answers to the interrogatories are necessary to a proper decision in this proceeding and are not reasonably obtainable from any other source, and to order the staff to answer the interrogatories.

DATED: July 31, 1981

Robert J. Vollen
Jane M. Whicher

Robert J. Vollen
Jane M. Whicher
109 North Dearborn, #1300
Chicago, IL 60602
(312) 641-5570

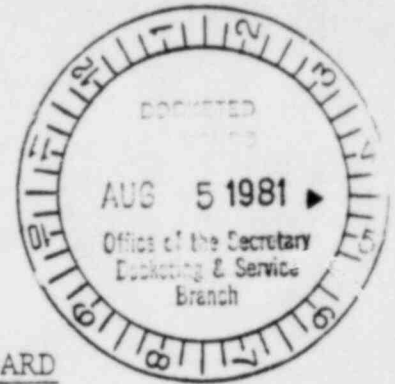
By:

Joe M. Whicher
Jane M. Whicher
Attorneys for Porter County
Chapter Intervenor

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



| | | |
|-------------------------|---|----------------------|
| In the Matter of |) | |
| |) | |
| NORTHERN INDIANA PUBLIC |) | Docket No. 50-367 |
| SERVICE COMPANY |) | (Construction Permit |
| (Bailly Generating |) | Extension) |
| Station, Nuclear-1) |) | |

CERTIFICATE OF SERVICE

I hereby certify that I served copies of the following documents:

Porter County Chapter Intervenor's Second Application Pursuant to 10 CFR §2.720(h)(2)(ii)

Porter County Chapter Intervenor's Second Set of Interrogatories to the NRC Staff

Porter County Chapter Intervenor's Fourth Set of Interrogatories to NIPSCO

Porter County Chapter Intervenor's Second Application for Subpoenas

Letter from Robert J. Vollen to William Eichhorn dated July 31, 1981

Porter County Chapter Intervenor's Sixth Request to NIPSCO for Production of Documents

Porter County Chapter Intervenor's Fourth Request to the NRC for Production of Documents

Letter from Robert J. Vollen to Stephen H. Lewis dated July 31, 1981

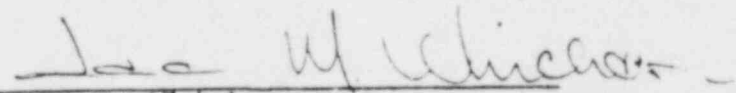
Porter County Chapter Intervenor's Motion for Leave to Initiate Further Discovery

on all persons on the attached service list, by causing them to be deposited in the U.S. mail, first class postage prepaid, this 31st day of July, 1981.

DATED: July 31, 1981

Robert J. Vollen
Jane M. Whicher

By:


Jane M. Whicher
Attorneys for Porter County Chapter
Intervenors

Robert J. Vollen
Jane M. Whicher
109 N. Dearborn
Suite 1300
Chicago, IL 60602
(312) 641-5570

SERVICE LIST

Herbert Grossman, Esq.
Administrative Judge
Atomic Safety & Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. Robert L. Holton
Administrative Judge
School of Oceanography
Oregon State University
Corvallis, Oregon 97331

Dr. J. Venn Leeds
Administrative Judge
10807 Atwell
Houston, Texas 77096

Maurice Axelrad, Esq.
Kathleen H. Shea, Esq.
Lowenstein, Newman, Reis,
Axelrad and Toll
1025 Connecticut Ave., N.W.
Washington, D.C. 20036

William H. Eichhorn, Esq.
Eichhorn, Eichhorn & Link
5243 Hohman Avenue
Hammond, Indiana 46320

Diane B. Cohn, Esq.
William P. Schultz, Esq.
Suite 700
2000 P Street, N.W.
Washington, D.C. 20036

Atomic Safety & Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

George & Anna Grabowski
3820 Ridge Road
Highland, Indiana 46322

Dr. George Schultz
807 E. Coolspring Road
Michigan City, Indiana 46360

Mr. Mike Olszanski
Mr. Clifford Mezo
Local 1010 - United Steelworkers
of America
3703 Euclid Avenue
East Chicago, Indiana 46312

Stephen H. Lewis, Esq.
Office of the Executive
Legal Director
U.S. Nuclear Regulatory Commissio
Washington, D.C. 20555

Anne Rapkin, Asst. Attorney Gener
John Van Vranken, Environmental
Control Division
188 W. Randolph - Suite 2315
Chicago, Illinois 60601

Docketing & Service Section (3)
Office of the Secretary
U.S. Nuclear Regulatory Commissio
Washington, D.C. 20555

Stephen Laudig, Esq.
21010 Cumberland Road
Noblesville, Indiana 46060