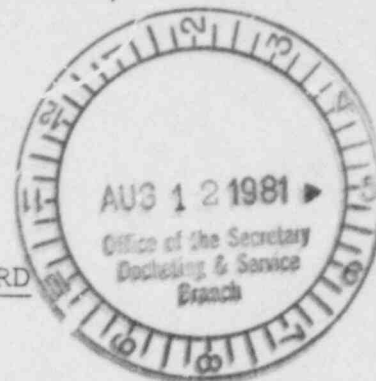




RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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

PEOPLE OF THE STATE OF ILLINOIS'
RENEWED APPLICATION FOR SUBPOENAS

People of the State of Illinois, by its attorney, Tyrone C. Fahner, Attorney General, pursuant to 10 C.F.R. §2.720(a), hereby renews its June 23, 1981 application to the Board for subpoenas directed to each of the following persons. In accordance with the Board's order, issued during the conference call of August 3, 1981, requiring the Intervenor to make statements of general relevancy in support of this renewed application, Illinois presents its view of the general relevancy of the deponents' testimony.*

1. Richard F. Brissette, of D'Appolonia Consulting Engineers, Inc.
2. Stevo Dobrijevic, of D'Appolonia Consulting Engineers, Inc.

Relevancy: Because Mr. Brissette and Mr. Dobrijevic signed the D'Appolonia report entitled "Assessment of the Influence of Dewatering at Bailly N-1", Illinois assumes that they were primarily responsible for its preparation. This report is apparently the theoretical

*Illinois' original application for subpoenas did not include a statement of general relevance because that is not necessary under 10 C.F.R. §2.720(a) unless the Board specifically requires it. In addition, this renewed application is accompanied by a Notice Of Depositions because the Board ordered during the said conference call that depositions be scheduled for the individuals for whom subpoenas are requested even though the Board has not yet ruled on the subpoena requests.

basis for NIPSCO's current dewatering plan and for NIPSCO's position that construction dewatering will not adversely affect the Indiana Dunes National Lakeshore.

3. The person at Sargent & Lundy who supervised or was primarily responsible for preparation of the August 27, 1979 report entitled: "Supplementary Information, Hydrogeologic Evaluation of Construction Dewatering, Bailly Nuclear Generating Station, Nuclear 1".
4. The person at Ground/Water Technology, Inc. who supervised or was primarily responsible for preparation of the August 27, 1979 report entitled: "Supplementary Information, Hydrogeologic Evaluation of Construction Dewatering, Bailly Nuclear Generating Station, Nuclear 1".
5. The person at Dames & Moore who supervised or was primarily responsible for preparation of the August 27, 1979 report entitled: "Supplementary Information, Hydrogeologic Evaluation of Construction Dewatering, Bailly Nuclear Generating Station, Nuclear 1".

Relevancy: Sargent & Lundy, Ground/Water Technology, Inc., and Dames & Moore prepared the report mentioned above. This report contains NIPSCO's current dewatering plan and other matters relating to dewatering. The individuals for whom subpoenas are requested should have knowledge of the history of NIPSCO's dewatering plans and efforts and of many matters relating to NIPSCO's current dewatering and monitoring plan.

Respectfully submitted,

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