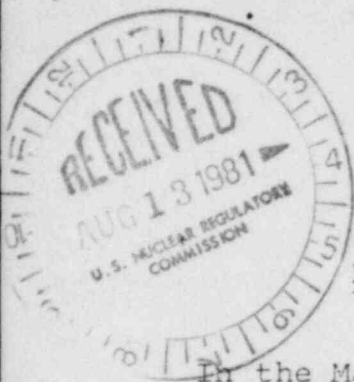


RELATED CORRESPONDENCE



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)

STATE OF ILLINOIS' NOTICE  
OF DEPOSITIONS

Please take notice that, pursuant to 10 C.F.R. §2.740(a) the People of the State of Illinois, by its attorney, Tyrone C. Fahner, Attorney General, shall take the depositions of the following persons commencing on the following dates at the following times:

1. 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", at 9:00 a.m. on Monday, September 21, 1981.
2. Richard F. Brissette, D'Appolonia Consulting Engineers, Inc., at 9:00 a.m. on Wednesday, September 23, 1981.
3. Stevo Dobrijevic, D'Appolonia Consulting Engineers, Inc., at 9:00 a.m. on Thursday, September 24, 1981.
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", at 9:00 a.m. on Friday, September 25, 1981.
5. Ther 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", at 9:00 a.m. on Monday, September 28, 1981.

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Each deposition shall continue from day to day until completed. Each deposition will be taken at the Attorney General's Office, Environmental Control Division, 188 West Randolph Street, Suite 2315, Chicago, Illinois 60601, before a certified court reporter, an officer authorized to administer oaths by the State of Illinois, associated with the firm of Longoria and Goldstine, Court Reporting Service, 10 South LaSalle, Suite 1118, Chicago, Illinois 60603.

Mr. Brisette and Mr. Dobrijevic will be examined upon the following matters:

1. The theoretical and empirical basis of the D'Appolonia report entitled: "Assessment of the Influence of Dewatering at Bailly Nuclear-1";
2. Documents and information referred to or used in preparing the said report;
3. The history of dewatering at the Bailly site;
4. The identity of persons who have or may have knowledge of the matters described in items 1 to 3 above; and
5. The existence of documents which contain information concerning the matters described in items 1 to 4 above.

The persons at Sargent & Lundy, Dames & Moore, and Ground/Water Technology, Inc. for whom subpoenas are requested will be examined upon the following matters:

1. All matters relating to the report entitled: "Supplementary Information, Hydrogeologic Evaluation of Construction Dewatering, Bailly Generating Station, Nuclear-1", August 17, 1979;
2. Documents and information referred to or used in preparing the said report;
3. The history of dewatering at the Bailly site;
4. The identity of persons who have or may have knowledge of

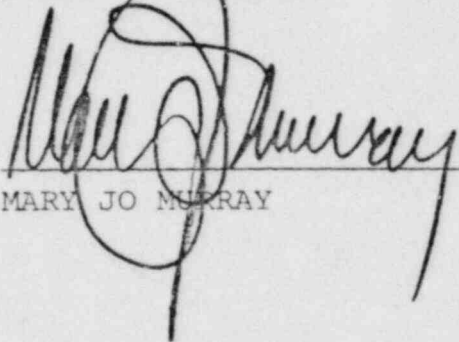
the matters described in items 1 to 3 above; and

5. The existence of documents which contain information concerning the matters described in items 1 to 4 above.

Respectfully submitted,

TYRONE C. FAHNER  
ATTORNEY GENERAL  
STATE OF ILLINOIS

BY:

  
MARY JO MURRAY

ANNE RAPKIN  
MARY JO MURRAY  
Assistant Attorneys General  
Environmental Control Division  
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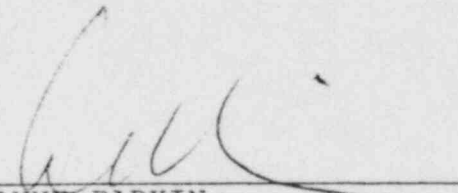
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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 foregoing People of the State of Illinois' Renewed Application For Subpoenas and State of Illinois' Notice Of Depositions on all persons on the attached Service List by causing them to be deposited in the U.S. mail, first class postage prepaid, on August 10, 1981.

  
\_\_\_\_\_  
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Assistant Attorney General

ANNE RAPKIN  
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Washington, D.C. 20555

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