

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
SERVICE COMPANY)	Extension)
)	
(Bailly Generating Station,)	
Nuclear-1))	

SUPPLEMENTAL ANSWERS OF THE PEOPLE OF THE STATE
OF ILLINOIS TO NIPSCO'S
SECOND SET OF INTERROGATORIES

The People of the State of Illinois, through its attorney, Tyrone C. Fahner, Attorney General, hereby submit Supplemental Answers to NIPSCO's Second Set of Interrogatories.

20. (a) Some of the rare species which could be caused to disappear from the dunes ecosystem include:

Aster junciformis
Bartonia virginica
Betula lutea
Betula papyrifera
Betula pumila
Carex bromoides
Carex seorsa
Coptis groenlandica
Cypripedium calceolus pubescens
Galium trifidum
Mitchella repens
Myosotis laxa
Pinus strobus
Polygonum arifolium pubescens
Potentilla palustris
Prunus alnifolia
Rhus vernix
Rubus pubescens
Salix candida
Salix sericea
Sarracenia purpurea
Thuja occidentalis
Trientalis borealis
Vaccinium atrococcum
Viola pallens
Nemophanthus mucronata

(c) Report on the Special Vegetation of the Indiana Dunes National Lakeshore,
Indiana Dunes National Lakeshore Research Program Report No. 80-01.

21. (b) Illinois cannot specify the reference values requested. Illinois' position, however, is that the natural water levels are irrelevant in determining whether a deficiency, surplus, or change in the water occurs; what is relevant is the change in shape of the cone of depression created by dewatering.

(d) N/A
(c) N/A
(f) N/A
(g) Robert Hilty
(h) N/A

22. (a) Longwell, Flint & Sanders, pp. 599-600.

24. (g) (2) WASH-1400 and Appendices, pp. 76 and 134 of the Main Report. See also Draft of the Sandia Study performed for the United States Nuclear Regulatory Commission January 1980, "Effect of Liquid Pathways on Consequences of Core Melt Accidents."

Respectfully submitted,

TYRONE C. FAHNER
Attorney General
State of Illinois

BY: 

ANNE RAPKIN

ANNE RAPKIN
MARY JO MURRAY
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NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

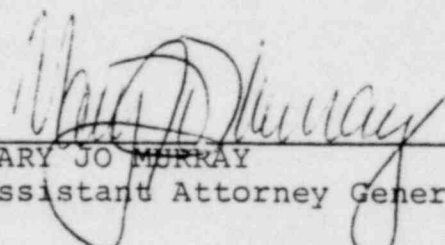
In the Matter of
NORTHERN INDIANA PUBLIC
SERVICE COMPANY
(Bailly Generating
Station, Nuclear-1)

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)
)
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Docket No. 50-367
(Construciton Permit
Extension)

CERTIFICATE OF SERVICE

I hereby certify that I served copies of the Answers of the People of the State of Illinois to NIPSCO's Third Set of Interrogatories and Supplemental Answers to Answers of the People of the State of Illinois' to NIPSCO's Second Set of Interrogatories 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 3, 1989.

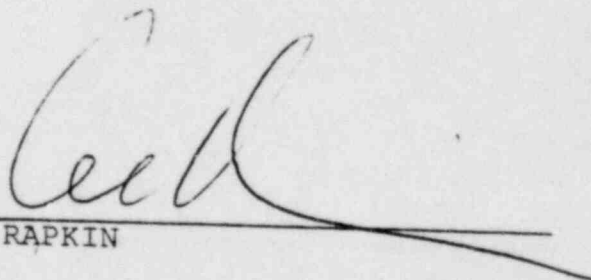


MARY JO MURRAY
Assistant Attorney General

ANNE RAPKIN
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AFFIRMATION

I, ANNE RAPKIN, hereby affirm that I am an Assistant Attorney General in the Environmental Control Division of the Office of the Illinois Attorney General; that the Illinois Attorney General represents Intervenor, People of the State of Illinois; that I have authority to submit answers on behalf of the People of the State of Illinois to NIPSCO's Second and Third Sets of Interrogatories; that I have read the foregoing Supplemental Answers to Answers of the People of the State of Illinois to NIPSCO's Second Set of Interrogatories and Answers of the People of the State of Illinois to NIPSCO's Third Set of Interrogatories and state that they are true and correct to the best of my knowledge and belief.

A handwritten signature in cursive script, appearing to read 'Anne Rapkin', is written over a horizontal line. The signature is fluid and stylized, with a long horizontal stroke extending to the right.

ANNE RAPKIN

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