

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 Station,	)	Extension)
Nuclear-1)	)	
	)	

PEOPLE OF THE STATE OF ILLINOIS'  
FIRST REQUEST TO NIPSCO FOR PRO-  
DUCTION OF DOCUMENTS

People of the State of Illinois, by its attorney, TYRONE C. FAHNER, Attorney General, State of Illinois, hereby requests that NIPSCO produce on September 4, 1981 at 9:00 A.M. at the offices of the Illinois Attorney General, 188 West Randolph, Suite 2315, Chicago, Illinois 60601, the documents described herein. This request for production of documents relates to the Staff report issued July 17, 1981 entitled: "NRC Staff Evaluation of the Bailly Construction Permit Extension".

The term "document" means any writing or recording of any kind, however produced or reproduced, including but not limited to letters, telegrams, memoranda, reports, studies, tape recordings, computer printouts, photographs, calendar and diary entries, minutes, pamphlets, notes, charts, tabulations and records of meetings, conferences and telephone or other conversations or meetings, which are in the actual or constructive possession, custody or control of NIPSCO. A described document includes all other documents which are attached to or relate to such document. The term "NIPSCO" includes Northern Indiana Public Service Company, its agents, employees, representatives, subsidiaries, and those consultants, contrac-

tors or subcontractors over whom NIPSCO retains control.

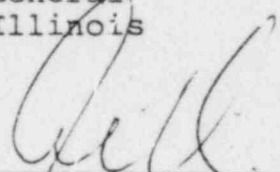
1. All documents relating to NIPSCO's verbal agreement to submit modifications to its monitoring and mitigation program, referred to on page 10 of the Environmental Impact Appraisal.

2. All documents relating to any proposed modifications to NIPSCO's monitoring and mitigation program with respect to the Unit 3 aquifer.

3. All documents submitted to the Staff, other than those already of record in this proceeding, relating to any of the matters discussed in the Staff's said report.

Respectfully Submitted,  
TYRONE C. FAHNER,  
Attorney General  
State of Illinois

By:

  
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