

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

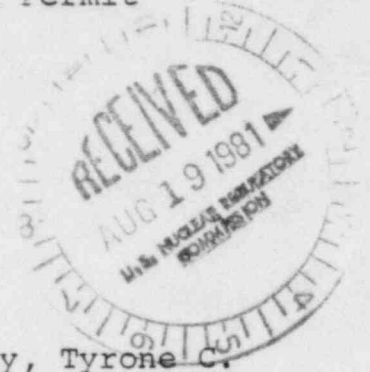
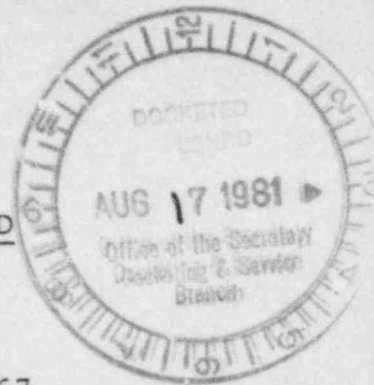
In the Matter of)	
)	
NORTHERN INDIANA PUBLIC)	Docket No. 50-367
SERVICE COMPANY)	(Construction Permit
(Bailly Generating Station,)	Extension)
Nuclear-1))	

PEOPLE OF THE STATE OF ILLINOIS'
MOTION FOR LEAVE TO FILE
APPLICATION FOR DISCOVERY AND
INTERROGATORIES INSTANTER

People of the State of Illinois, by its attorney, Tyrone C. Fahner, Attorney General of the State of Illinois, hereby respectfully moves for leave to file with the Board the attached People of the State of Illinois' Application for Discovery Regarding Staff Documents, First Set of Interrogatories to the NRC Staff, and Third Set of Interrogatories to NIPSCO. The Application for Discovery, the Interrogatories, and several items of discovery filed on August 11 relate to the Staff documents issued July 17, 1981. Under the Board's order of August 3, all of Illinois' discovery regarding those documents should have been filed on August 11. However, due to the press of work resulting from the August 3 Board order and also to other responsibilities of the undersigned in the Attorney General's office, preparation of all of Illinois' discovery on the Staff documents could not be completed until today, August 13, 1981.

Respectfully submitted,

TYRONE C. FAHNER
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BY: _____

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