

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 (Bailly)	(Construction Permit
Generating Station,)	Extension)
Nuclear-1))	

PEOPLE OF THE STATE OF ILLINOIS'
APPLICATION FOR DISCOVERY
REGARDING STAFF DOCUMENTS

People of the State of Illinois, by its attorney, Tyrone C. Fahner, Attorney General of the State of Illinois, pursuant to the Board's order of July 10, 1981, hereby applies to the Board for leave to serve discovery on the NRC Staff regarding the Staff documents issued on July 17, 1981 entitled: "NRC Staff Evaluation of the Bailly Construction Permit Extension Request". The discovery necessitated by the staff documents consists of the two sets of Interrogatories filed herewith and several pleadings filed on August 11, 1981:

1. Illinois' First Set of Interrogatories to the NRC Staff.
2. Illinois' Third Set of Interrogatories to NIPSCO.
3. Illinois' First Request to the NRC Staff for Production of Documents.
4. Illinois' First Request to NIPSCO for Production of Documents.
5. Illinois' Second Application Pursuant to 10 C.F.R. §2.720(h)(2)(i).
6. Illinois' Notice of Depositions.
7. Illinois' Amended Notice of Deposition of M. David Lynch.

8. Illinois' Motion for Extending Time for Taking Depositions.

The importance of this discovery is self-evident. Therefore, Illinois respectfully requests that the Board grant this application and that the parties respond to the discovery requests filed today and on August 11, 1981.

Respectfully submitted,

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