

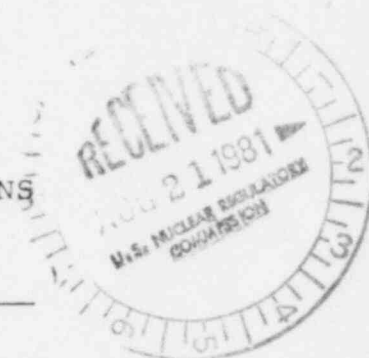
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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,)	August 18, 1981
Nuclear-1))	



NORTHERN INDIANA PUBLIC SERVICE COMPANY'S OBJECTIONS
TO THE PEOPLE OF THE STATE OF ILLINOIS'
SECOND SET OF INTERROGATORIES AND
MOTION FOR PROTECTIVE ORDER



Northern Indiana Public Service Company (NIPSCO) objects to Interrogatories 12(c), 13(b) and (c) of The People of the State of Illinois' (Illinois) Second Set of Interrogatories to NIPSCO for the reasons stated below and requests a protective order providing that no further response to these interrogatories is required.

The objectionable interrogatories read as follows:

"12. a) Does NIPSCO expect groundwater seepage into Bailly N-1 after construction is completed?

b) Describe the basis for the answer to Interrogatory #12(a).

c) Identify and describe all communications, whether verbal or written, between NIPSCO and its consultants and between NIPSCO and the NRC regarding post-construction groundwater seepage into Bailly N-1.

13. a) Does NIPSCO plan to seal, in any way, the foundation of Bailly N-1?

b) If so, describe such plans in detail.

c) Describe the basis on which NIPSCO believes that such sealing will be adequate to reduce or eliminate groundwater seepage."

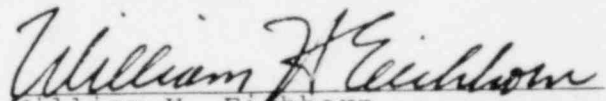
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NIPSCO objects to part (c) of Interrogatory 12 and parts (b) and (c) of Interrogatory 13 because they seek information dealing with the seepage of groundwater into the Bailly nuclear plant after the construction thereof and the plan to seal the foundations of Bailly. Not only do these matters not deal with the extended period of construction, but they were reviewed in the original construction permit proceedings for Bailly and cannot be relitigated in this proceeding. Northern Indiana Public Service Company (Bailly Generating Station, Nuclear-1), 7 AEC 557, 589 (1974). The information sought by these interrogatories is not relevant to any matters being considered in this construction permit extension proceeding.

NIPSCO therefore requests a protective order providing that no further response to Interrogatories 12(c), 13(b) and (c) is required.

Respectfully submitted,

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