

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

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Docket No. 50-367 JUN 17 1982

OFFICE OF SECRETARY
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20545
BRANCH

Memorandum in Support of Application for Award of Fees and Expenses
under the Equal Access to Justice Act

We, Anna and George Grabowski, respectfully request that the application made by the Business and Professional People for the Public Interest for award of fees and expenses caused by the Baillly case be accepted.

We personally know hundreds of other people who opposed the Baillly nuclear plant, but none of us could have afforded the kind of legal effort that BPI made so well. Even the many organizations that we belong to or know of that opposed Baillly could not have paid for the expert legal defense provided by BPI.

Without the work of the attorneys at BPI, the thousands of people in our area who were opposed to Baillly would not have been represented in the legal proceedings. Without BPI, there would not have been equal access to justice in the Baillly case.

We strongly urge you to award to BPI the money for fees and expenses which they have requested and which we believe they rightfully deserve to receive.

June 7, 1982

Anna M. Grabowski

Anna M. Grabowski

George V. Grabowski

George V. Grabowski

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