

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

TELE

March 26, 1980

IN THE MATTER OF:

NORTHERN INDIANA PUBLIC
SERVICE COMPANY (Bailly
Generating Station,
Nuclear-1)

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DOCKET NO. 50-367.

SUPPLEMENTAL STATEMENT TO ATOMIC SAFETY
AND LICENSING BOARD PREHEARING CONCERNING STANDING.

United Steelworkers of America Local 1010 seeks standing to intervene in proceedings on NIPSCO'S construction permit extension for Bailly Nuclear One as a matter of right. Our contention 10-B of "Petition to Deny Permit" contends that further construction of Bailly will harm the Indiana Dunes National Lakeshore Park of which many of our Members are users. Further, without the construction permit extension the Bailly plant, which will adversely affect our Members, cannot be built.

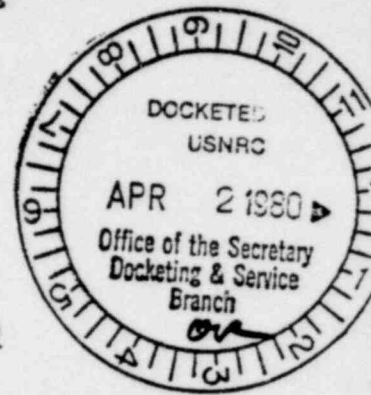
Local 1010 additionally seeks standing as a matter of discretion because our participation will assist in developing a more complete record. Local 1010 has previously petitioned the Nuclear Regulatory Commission requesting public hearing on NIPSCO'S proposed change in the foundation of Bailly Nuclear One. Local 1010's 19,000 Members are reside in a broad area of two states and their interests are such that they cannot adequately be represented by any other party to the proceedings.



Respectfully Submitted,

Joe Frantz

Joe Frantz, Secretary
Environmental Committee



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)

AFFIDAVIT OF JOE FRANTZ

Joe Frantz declares and states as follows:

1. I reside at 535 Miami Place in the City of Gary, Indiana. My residence is located approximately 8 miles from the proposed site of the Bailly Generating Station, Nuclear 1.

2. I am secretary of the Environmental Committee of the United Steelworkers of America, Local Union 1010, which is seeking to intervene in this construction permit extension proceeding.

3. Local 1010 represents approximately 19,000 Employees of the Indiana Harbor Works of Inland Steel Company, which is approximately 15 miles from the proposed site of Bailly Nuclear One. The general Membership of Local 1010 voted in 1976 to oppose construction of a nuclear generating station at the Bailly site. The general Membership of Local 1010 voted 1979 to authorize the Local Union to oppose the application of Northern Indiana Public Service Company for a construction permit extension for Bailly Nuclear 1, and to petition The Nuclear Regulator Commission for a hearing on the construction permit extension in our behalf.

4. I and many other members of Local 1010 are users of the Indiana Dunes National Lakeshore. The continued construction of Bailly Nuclear One will cause further site-dewatering which harms the interests of our members as users of the park.

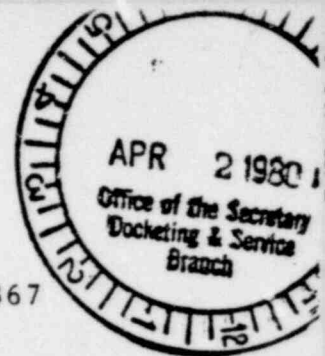
5. The continued construction of Bailly Nuclear One threatens the health and jobs of members fo Local 1010. If Bailly Nuclear One is built and operated, the possibility of an accident threatens our health and jobs. This risk is aggravated by the lack of viable evacuation plans for the highly populated areas surrounding the site. If the plant is built and not operated, the utility rate increases necessary to finance both an idle generating station and emergency sources of power will jeopardize our ability to purchase the power necessary to protect our health and our families'. It will also jeopardize our jobs because steelmills depend upon adequate supplies of electricity at reasonable rates.

6. Unless NIPSCO can demonstrate the ability to proceed with construction of Bailly Nuclear One without harming the Indiana Dunes National Lakeshore, and unless NIPSCO can prove ability to protect the jobs and safety and health of our members in the event of a nuclear accident, the construction permit extension should be denied.

In accoraance with 28 U.S.C. S 1746, I
declare under penalty of perjury that
the foregoing is true and correct.
Executed on March 26, 1980.

Joe Frantz
JOE FRANTZ

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



IN THE MATTER OF:)

NORTHERN INDIANA PUBLIC)
SERVICE COMPANY (Bailly)
Generating Station,)
Nuclear-I)

DOCKET NO. 50-367

CERTIFICATE OF SERVICE

I hereby certify that I have served copies of the SUPPLEMENTAL STATEMENT TO ATOMIC SAFETY AND LICENSING BOARD PREHEARING AND AFFIDAVIT OF JOE FRANTZ, upon each of the following persons by deposit in the United States mail, first class postage prepaid, this 27th day of March, 1980.

Herbert Grossman, Chairman
Atomic Licensing and Safety Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Diane Cohn
Suite 700
2000 P Street N.W.
Washington, D.C. 20036

Katheleen Shea
1025 Connecticut Ave. N.W.
Washington, D.C. 20036

Mr. Glenn Bright
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Richard Cole
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety & Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

William H. Eichorn, Esq.
Eichorn, Morrow & Eichorn
5243 Hohman Ave.
Hammond, Indiana 46320

Robert J. Vollen
Business & Professional People
For The Public Interest
109 N. Dearborn St. Suite-1300
Chicago, Illinois 60611

Steven Goldberg
Counsel for the NRC Staff
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section
Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Robert L. Graham
Jenner & Block
One IBM Plaza-Suite 4300
Chicago, Illinois

Dean Hansell
Assistant Attorney General
188 W. Randolph St.
Chicago, Illinois 60601

Richard L. Robbins
Lake Mich. Fed.
53 W. Jackson Blvd.
Chicago, Illinois 60604