



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,)	December 3, 1980
Nuclear-1))	

NORTHERN INDIANA PUBLIC SERVICE COMPANY'S
RESPONSE TO NOVEMBER 20, 1980
ORDER REGARDING DISCOVERY

Supplementing prior pleadings (NIPSCO's Response to Second Motion to Compel (November 10, 1980) and Supplemental Response to PCCI's First Request for Production of Documents (October 14, 1980)), Northern Indiana Public Service Company (NIPSCO) responds to the Order Regarding Discovery of the Atomic Safety and Licensing Board, dated November 20, 1980. NIPSCO hereby adopts the response and objections^{*/} of General Electric (GE) made in connection with PCCI's request for production of documents relating to contracts for the supplying of the nuclear steam supply system and turbine generator for Bailly Generating Station, Nuclear-1.

^{*/} As incorporated in GE's Motion for Protective Order (October 14, 1980) and GE's Answer in Opposition to PCCI's Second Motion to Compel Production of Documents (November 11, 1980).

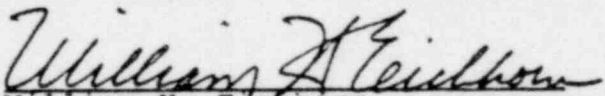
G 8012290181

DS03
S
1/1

It was never NIPSCO's intention to raise objections to the request to produce GE contracts in addition to those cited by GE. In asking that its further response regarding those contracts be deferred until the Board ruled on GE's motion, NIPSCO was merely referring to its response by way of producing the documents if so ordered by the Board and the manner in which the documents would be produced, i.e., with or without a protective order. As NIPSCO stated in prior pleadings, it did not intend to raise any grounds for the nonproduction of the GE contracts other than those cited by GE and that "NIPSCO recognizes that its production of the contracts will be governed by the Board's ruling(s) on GE's Motion for Protective Order and PCCI's Motion to Compel." (NIPSCO's Response to Second Motion to Compel (November 10, 1980)).

Respectfully submitted,

EICHHORN, EICHHORN & LINK
5243 Hohman Avenue
Hammond, Indiana 46320

By: 
William H. Eichhorn

Attorneys for Northern Indiana
Public Service Company

LOWENSTEIN, NEWMAN, REIS,
AXELRAD & TOLL
1025 Connecticut Avenue, N.W.
Washington, D.C. 20036

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,)	December 3, 1980
Nuclear-1))	

CERTIFICATE OF SERVICE

I hereby certify that copies of Northern Indiana Public Service Company's Response to November 20, 1980 Order Regarding Discovery dated December 3, 1980, were served on the following by deposit in the United States mail, postage prepaid, on this 3rd day of December, 1980:

Herbert Grossman, Esquire
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Glenn O. Bright
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Richard F. Cole
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

Howard K. Shapar, Esquire
Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Steven Goldberg, Esquire
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Susan Sekuler, Esquire
Environmental Control Division
188 West Randolph Street
Suite 2315
Chicago, Illinois 60601

Robert J. Vollen, Esquire
c/o BPI
109 North Dearborn Street
Suite 1300
Chicago, Illinois 60602

Edward W. Osann, Jr., Esquire
One IBM Plaza
Suite 4600
Chicago, Illinois 60611

Robert L. Graham, Esquire
One IBM Plaza
44th Floor
Chicago, Illinois 60611

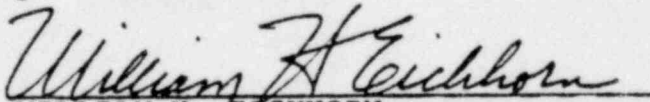
Mr. Mike Olszanski
Mr. Clifford Mezo
United Steelworkers of America
3703 Euclid Avenue
East Chicago, Indiana 46312

Diane B. Cohn, Esquire
William B. Schultz, Esquire
Suite 700
2000 P Street, NW
Washington, D.C. 20036

Richard L. Robbins, Esquire
53 West Jackson Boulevard
Chicago, Illinois 60604

Mr. George Grabowski
Ms. Anna Grabowski
7413 W. 136th Lane
Cedar Lake, Indiana 46303

Dr. George Schultz
807 East Coalspring
Michigan City, Indiana 46360


WILLIAM H. EICHORN
Eichhorn, Eichhorn & Link
5243 Hohman Avenue
Hammond, Indiana 46320

Attorneys for Northern Indiana
Public Service Company