



Northern Indiana Public Service Company

General Offices / 5265 Hohman Avenue / Hammond, Indiana 46325 / Tel.: 853-5200 (213)

EUGENE M. SHORB
FIRST VICE PRESIDENT

November 20, 1980

Mr. Harold Denton, Director
Nuclear Reactor Regulation
Nuclear Regulatory Commission
Washington, D. C. 20555

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NIPSCO SERVICES

Dear Mr. Denton:

We wrote to you on October 21, 1980, concerning the October 3, 1980 letter from Cecil D. Andrus, Secretary of the Interior, to Chairman Ahearne. We pointed out that the Secretary's conclusions regarding possible impacts of construction dewatering at Bailly N-1 on the Cowles Bog area of the Indiana Dunes National Lakeshore, in our opinion, cannot be validly drawn from the USGS reports referenced in the October 3 letter. We also indicated that we would submit a detailed response to the Secretary's letter. Twenty-five copies of that report are attached. Its major conclusions can be summarized as follows:

1. Using actual field data (including the results of pumping tests and demonstrated permeabilities), the calculated lateral extent of drawdown produced by NIPSCO's planned dewatering system (the "radius of influence") is less than 950 feet. Even when the erroneous coefficient of permeabilities assumed by the USGS is used in the calculations, the radius of influence does not exceed 1450 feet. It is therefore clear that dewatering associated with construction of Bailly N-1 cannot have any effect on Cowles Bog, which is more than 8000 feet away.
2. The drawdown predicted by the USGS is wrong and unreliable for several reasons. The USGS model ignored or misused a substantial body of field data available for the study area. The assumptions used by USGS bear little resemblance to the field data. Finally, there are defects in application of the model itself.

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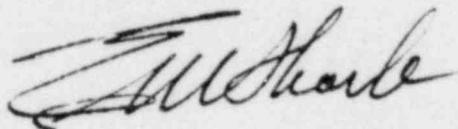
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The effects of dewatering were carefully and accurately addressed during the Bailly construction permit hearing on environmental matters. A substantial quantity of additional field data has been accumulated since the hearing, which demonstrates that the predictions of dewatering effects made at the hearing were conservative; i. e., the predicted effects are greater than the actual effects. The additional data provided in the attached report clearly demonstrate that Bailly N-1 dewatering cannot affect Cowles Bog, obviating any reason to update or supplement the Environmental Impact Statement in order to re-examine dewatering effects. We urge the NRC Staff to complete promptly preparation of the environmental impact appraisal which Staff counsel has indicated will be ready by January 15, 1981.

Very truly yours,



EMS:cgs
Attachment