

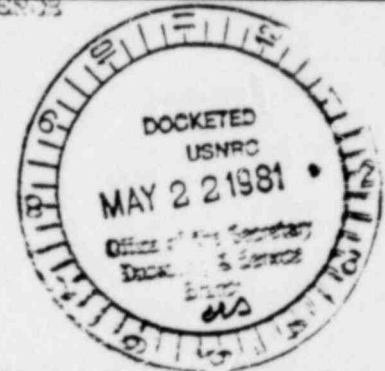


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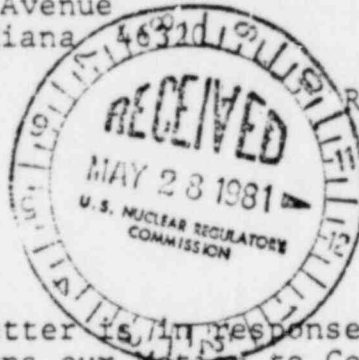
## Business and Professional People for the Public Interest

109 North Dearborn Street, Suite 1300 • Chicago, Illinois 60602 • Telephone: (312) 641-5570

May 19, 1981



Mr. William H. Eichhorn  
Eichhorn, Eichhorn & Link  
5243 Hohman Avenue  
Hammond, Indiana



Re: Northern Indiana Public Service  
Company (Bailly Generating Station  
Nuclear-1) Docket No. 50-367  
(Construction Permit Extension)

Dear Bill:

This letter is in response to your letter of April 28, 1981, which concerns our Motion to Compel Answers to PCCI's First Set of Interrogatories to NIPSCO.

While we share your desire to avoid unnecessary Board rulings, the method you have chosen in an effort to accomplish that leaves us somewhat confused. Had the factual information in your letter been contained in NIPSCO's "Response" to the Interrogatories, our Motion to Compel probably would not have been necessary. However, a letter from counsel is not, it seems to us, an adequate substitute for sworn answers to interrogatories.

If your letter is intended as an offer to submit amended responses to Interrogatories 19, 20(a) and 20(c) to include the factual information contained in your letter, the matter can be quickly resolved. Upon receipt of such amended responses in proper form, we would be pleased to notify the Board that we withdraw our Motion to Compel.

Very truly yours,

*Jane M. Whicher*

Jane M. Whicher  
One of the Attorneys for Porter  
County Chapter Intervenors

JMW:beg

cc: See attached

DS02.1/1

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cc:    Administrative Judge Herbert Grossman  
      Administrative Judge Robert L. Holton  
      Administrative Judge J. Venn Leeds  
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