

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

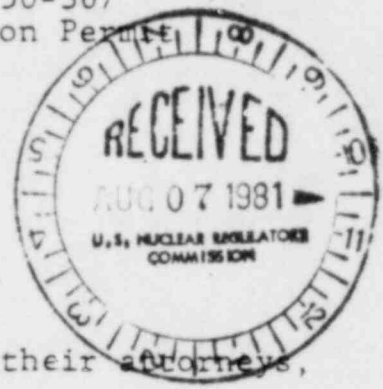
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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

Docket No. 50-367
(Construction Permit Extension)

PORTER COUNTY CHAPTER INTERVENORS'
SECOND APPLICATION PURSUANT TO
10 CFR §2.720(h)(2)(ii)



Porter County Chapter Intervenors (PCCI), by their attorneys, hereby apply to the Board pursuant to 10 CFR §2.720(h)(2)(ii) for an order requiring the NRC staff to answer Porter County Chapter Intervenors' Second Set of Interrogatories to the NRC Staff, being filed simultaneously with this application. Because PCCI cannot adequately prepare its case without the staff's answers, they are necessary to PCCI's presentation of their case and evaluation of the staff's case, and thus to a proper decision in this proceeding. Since the interrogatories go to matters solely within the staff's knowledge, answers are not reasonably obtainable from any other source.

PCCI, therefore, request the Board to find, under 10 CFR §2.720(h)(2)(ii), that answers to the interrogatories are necessary to a proper decision in this proceeding and are not reasonably obtainable from any other source, and to order the staff to answer the interrogatories.

DATED: July 31, 1981

Robert J. Vollen
Jane M. Whicher

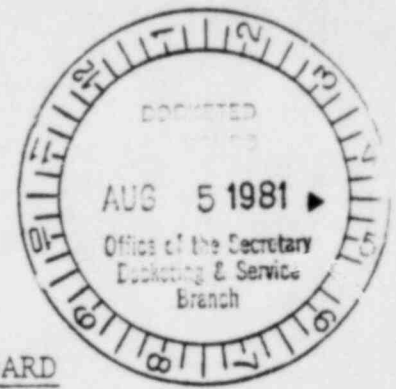
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By:

Joe M. Whicher
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Chapter Intervenors

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RELATED CORRESPONDENCE



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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|-------------------------|---|----------------------|
| In the Matter of |) | |
| |) | |
| NORTHERN INDIANA PUBLIC |) | Docket No. 50-367 |
| SERVICE COMPANY |) | (Construction Permit |
| (Bailly Generating |) | Extension) |
| Station, Nuclear-1) |) | |

CERTIFICATE OF SERVICE

I hereby certify that I served copies of the following documents:

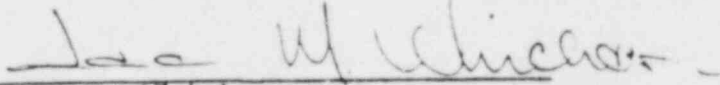
- Porter County Chapter Intervenors' Second Application Pursuant to 10 CFR §2.720(h)(2)(ii)
- Porter County Chapter Intervenors' Second Set of Interrogatories to the NRC Staff
- Porter County Chapter Intervenors' Fourth Set of Interrogatories to NIPSCO
- Porter County Chapter Intervenors' Second Application for Subpoenas
- Letter from Robert J. Vollen to William Eichhorn dated July 31, 1981
- Porter County Chapter Intervenors' Sixth Request to NIPSCO for Production of Documents
- Porter County Chapter Intervenors' Fourth Request to the NRC for Production of Documents
- Letter from Robert J. Vollen to Stephen H. Lewis dated July 31, 1981
- Porter County Chapter Intervenors' Motion for Leave to Initiate Further Discovery

on all persons on the attached service list, by causing them to be deposited in the U.S. mail, first class postage prepaid, this 31st day of July, 1981.

DATED: July 31, 1981

Robert J. Vollen
Jane M. Whicher

By:


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