

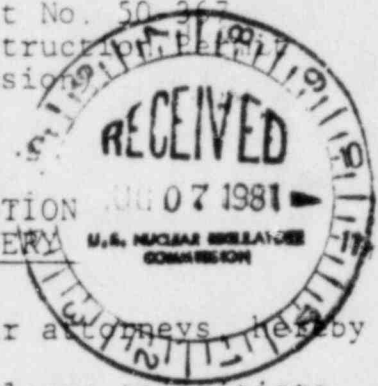
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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
Extension)



PORTER COUNTY CHAPTER INTERVENORS' MOTION
FOR LEAVE TO INITIATE FURTHER DISCOVERY

Porter County Chapter Intervenors, by their attorneys hereby
move the Board to enter an order granting them leave to initiate
new discovery, after July 31, 1981, seeking information to follow
up on information in the following:

1. NRC Staff Answers to Porter County Chapter Intervenors' First Set of Interrogatories (May 19, 1981), dated July 24, 1981;
2. documents produced with a letter dated July 24, 1981 from Stephen H. Lewis to Robert J. Vollen in response to Porter County Chapter Intervenors' Second Request to the NRC for Production of Documents (May 19, 1981);
3. documents produced with a letter dated July 24, 1981, from Stephen H. Lewis to Robert J. Vollen, in response to Porter County Chapter Intervenors' Third Request to the NRC for Production of Documents (June 9, 1981).

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All of the above described documents and interrogatory answers were received by counsel for PCCI on July 31, 1981, and, therefore, no opportunity exists for reviewing them and initiating follow-up discovery by that date.

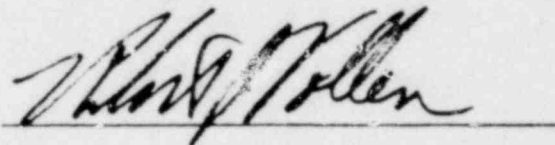
PCCI respectfully submit that leave should be granted to initiate new follow-up discovery after July 31, 1981.

DATED: July 31, 1981

Respectfully submitted,

Robert J. Vollen
Jane M. Whicher

by:

A handwritten signature in black ink, appearing to read "Robert J. Vollen", is written over a horizontal line.

Attorneys for Porter County Chapter
Intervenors

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