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## 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)

PEOPLE OF THE STATE OF ILLINOIS'
FIRST REQUEST TO THE NRC STAFF FOR
PRODUCTION OF DOCUMENTS

People of the State of Illinois, by its attorney, TYRONE C. FAHNER,

Attorney General, State of Illinois, pursuant to the 10C.F.R. §2.744, hereby requests
that the NRC Staff produce for inspection and copying on Friday, September 4, 1981
at 9:00 a.m. at the office of the Attorney General, 188 West Randolph Street, Suite
2315, Chicago, Illinois, 60601, the documents described herein which are not available to Illinois pursuant to 10 C.F.R. §2.790 in the NRC's Public Document Room.

The term "document" means any writing or recording of any kind, however produced or reproduced, including but not limited to letters, telegrams, memoranda, reports, studies, tape recordings, computer printouts, photographs, calendar and diary entries, minutes, pamphlets, notes, charts, tabulations, and records of meetings, conferences and telephone or other conversations or meetings, which are in the actual or constructive possession, custody or control of the NRC. A described document includes all other documents which are attached to or relate to such documents, including but not limited to drafts of the described documents. The term "NRC Staff" includes the United States Nuclear Regulatory Commission, its staff, members, attorneys, employees, consultants, divisions or subdivisions, contractors and subcontractors.

- 1. All documents referred to or used in preparation of the Staff's

  July 17, 1981 report entitled: "NRC Staff Evaluation of the Bailly Construction Permit//
  Extension Request".
- All drafts and prior versions of any portions of the said report, 8108200136 810811 PDR ADDCK 05000367

- 3. All working notes and/or calculations made or done in connection with the preparatior of the said report.
- 4. All memos, notes, and other writings relating or referring to the said report.
- 5. All memos, notes, and other writings relating to NIPSCO's verbal agreement to submit modifications to its monitoring and mitigation program, referred to on page 10 of the Environmental Impact Appraisal in the said report.
- 6. All documents submitted by NIPSCO to the Staff, other than those already of record in this proceeding, relating to any of the matters discussed in the said report.

Respectuflly Submitted,

TYRONE C. FAHNER Attorney General State of Illinois

By.

Anne Rapkin, Assistant Attorney General

Anne Rapkin
Mary Jo Murray
Assistant Attorneys General
Environmental Control Division
188 West Randolph Street
Chicago, Illinois 60601
312/793-2491