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' MOTION FOR EXTENDING TIME FOR TAKING DEPOSITIONS

On August 10, 1981 PCCI requested that the Board extend the September 30, 1981 deadline for taking depositions established by the Board's order of August 3, 1981 (conference call).

Illinois hereby also moves the Board to extend the deposition deadline and in support hereof adopts in full the reasoning set forth in PCCI's motion.

Illinois would also like to point out that the undersigned attorneys have responsibilities in the Attorney General's Office in addition to this litigation; it is impossible to give even the most minimal attention to those other responsibilities under the discovery schedule imposed by the Board. To place the parties under such extraordinary burdens without there being any benefits to anyone from doing so, simply does not make sense.

the time for taking depositions in connection with admitted contention be extended beyond September 30, 1981.

Respectfully submitted,

TYRONE C. FAHNER Attorney General State of Illinois

BY:

ANNE RAPKIN

BY:

MARY JO MURRAY (ak)

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DATED: August 11, 1981

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NORTHERN INDIANA PUBLIC SERVICE COMPANY (Bailly Generation, Nuclear,) Docket No. 50-367 (Construction Permit Extension)

CERTIFICATE OF SERVICE

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

- 1. People of the State of Illinois' First Request to the NRC Staff for Production of Documents;
- People of the State of Illinois' Motion for Extending Time for Taking Depositions;
- 3. People of the State of Illinois' Amended Notice of Deposition of M. David Lynch;
- 4. People of the State of Illinois' Second Application Pursuant to 10 C.F.R. §2.70(L)(2)(i);
- 5. People of the State of Illinois' Notice of Depositions;
- 6. People of the Stace of Illinois' First Request to NIPSCO for Production of Documents

on all persons on the attached service list, by depositing them in the U. S. Mails, first class postage prepaid, on this llth day of August, 1981.

Anne/Rapkin

SERVICE LIST

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