


Title: Comprehensive Radiation Protection Plan Annual Self-Assessment					
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1. Purpose

This document is intended to meet the requirements found in the CNX Comprehensive Radiation Protection Plan (CRPP) requiring the Radiation Safety Office (RSO) to complete an annual self-assessment of the CRPP and document the results of the assessment.

2. Scope of Application

This document applies to the elements of the CRPP and records created for adherence to the CRPP.

3. Self-Assessment

3.1 Training

The CRPP requires training for CNX employees performing work with or around NORM/TENORM or other radioactive material. This training has been reviewed and delivered to employees through Dayforce CBT training in November 2023. Training was also provided to NORM Surveyors in October and November 2023 through a 4-hour NORM Surveyor course. A new hire to CNX was also added as an additional RSO resource to assist with the CRPP.

3.2 Program Self-Assessment

The CRPP was reviewed in detail in October 2023. Major revisions to the Plan include:

- Company RSO changed.
- Training for RSO was completed in October 2023.
- Survey frequency for radiation surveys changed from quarterly to monthly.

3.3 General Survey and Monitoring Requirements


In order to compile a more comprehensive baseline for potential exposure to radiation, the survey frequency for facilities was changed from quarterly to monthly. Once a more reliable baseline is established, this frequency will be reviewed. Transportation surveys (waste) are completed per container. Survey records are reviewed by the RSO on a daily basis for drill cuttings and a monthly basis for other survey types.

3.4 Findings

After analysis of survey records referenced above, there were no findings of any unanticipated TENORM levels associated with operations. CNX will continue monitoring survey records to identify any unanticipated TENORM levels that may create higher than baseline exposure risk for operational personnel or others. To date for the survey data analyzed, no such levels have been observed.

3.5 Instrumentation Use, Maintenance and Calibration

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Existing gamma detection instruments and sent to Applied Health Physics (AHP) for repair and calibration. Several of the instruments were beyond repair and were discarded. The remaining instruments were sent to Ludlum for calibration. Additional gamma detection instruments (5 total plus additional check sources) were purchased to ensure compliance with the CRPP. The calibration schedule was reviewed to ensure there are enough instruments in the field to meet the requirements of the CRPP and allow for annual calibration of the instruments. In addition to Ludlum 19s, a Ludlum 2929 dual channel scanner scaler was purchased to perform count smears and air samples for alpha and beta radiation.

3.6 Records

A Sharepoint site was revised to store all records created to conform to the requirements of the CRPP. These records include:

- Surveys
- Data Analysis spreadsheet
- Instrumentation records
- Calibration records
- Training records

4. Revisions

Revision (0) Date November 8, 2023
New document developed